

52 0000 2268

AMERICAN CYANAMID CO
FORT WORTH TX
478A.TXD008017261 0001
AMERICAN CYANAMID CO
FORT WORTH, TX 76106

TXD008017261
RC NT VOL 01



000000010117 HZ/RC/NT

ANAMID CO
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0 252 0000 2269

FROM Senator Lloyd Bentsen			CONTROL NO. HAZ-114-89
SUBJECT AND DATE RE: Investigate Cyhnamid Chemical Co.			DATE REC'D 7/7/89
			DUE DATE XXXXXX 7-12-89
REFERRED (1) BROWN	(2)	(3) 42	(4)
DATE XXXXXX 7/7/89			
REPLY SENT TO			DATE RELEASED
REMARKS			ACKNOWLEDGED - DATE JUL 14 1989
			<input type="checkbox"/> NO ANSWER NEEDED
			<input type="checkbox"/> (Explain in remarks)

EPA Form 5160-1 (6-72)
REPLACES FWPCA FORM 72 AND
HEW-73 WHICH MAY NOT BE USED.

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE

0122 0000 2270

JUL 14 1989

Honorable Lloyd M. Bentsen
United States Senator
961 Federal Building
Austin, Texas 78701

Dear Senator Bentsen:

Thank you for your letter of June 14, 1989, requesting information regarding citizens' concerns pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of the Environmental Protection Agency (EPA) in early 1980 by the U.S. Department of Labor. The EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but were being stored in container and tank storage units. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983, at which time, the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

Allegations concerning past operating practices at this site were recently raised again in various news media reports. EPA investigated similar allegations in 1980, 1981, and 1982. Based on data gathered during these investigations, it does not appear that hazardous waste was buried at the site, nor does the site appear to immediately threaten human health or the environment. EPA has determined that a new investigation is not warranted; however, these allegations are being investigated by the City Manager's Office in Fort Worth. EPA has offered to provide any necessary technical assistance for purposes of their investigation.

Please be assured that the Agency has a continuing interest in this matter. If you have any questions, or need further assistance, do not hesitate to call me.

Sincerely yours,

Original Signed By:

Robert E. Layton Jr., P.E.
Regional Administrator

bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H), Gilleland (6AX)
6H-CT:JTRUITT:cds:07-10-89:5-6794 File Code No. TXD008017261 Enf. 1
HAZ-114-89

6H-CT	6H-C	6H-S	6H	6H	6X
COLEMAN	BROWN	WILLIAMSON	GERSH	DAVIS	CHARLES

0 152 0000 2271

TO: celk DATE: 6-27-89

CONGRESSIONAL INQUIRY

PLEASE EXPEDITE

INSTRUCTIONS: PREPARE FINAL FOR SIGNATURE OF: Robert E. Layton Jr., P. E.
Regional Administrator

RETURN TO CHARLOTTE HEROD BY CLOSE OF BUSINESS: _____

(FIRM)
7/3/89

CONTROL SLIP FOR OFFICE OF CONGRESSIONAL CORRESPONDENCE
RM. 227-0, WSMW
382-7640

CONTROL NO: AL892967

DUE DATE: 7/ 7/89

FROM: HONORABLE LLOYD M. BENTSEN D/TX
UNITED STATES SENATOR
(STATE OFFICE)

INCOMING: 6/14/89

RECEIVED: 6/21/89

ASSIGNED: 6/21/89

CLOSED: _____

CONSTITUENT: MR. & MRS. R. SANDERS
N. RICHLAND HILLS, TX

SUBJECT: INVESTIGATE CYHNAMID CHEMICAL CO.

ASSIGNED: 1 REGION 06

3 _____

2 _____

4 _____

SIGNATURE: REGIONAL ADMINISTRATOR

SPECIAL INSTRUCTIONS:

SEND "HARD" COPY OF REPLY ALONG WITH ORIGINAL CONTROL
SLIP TO ROSEMARY CARROLL A101 HDGTRS.

NOTE:

COURTESY COPIES:

SOLID WASTE & EMERG RESP
WATER
OCL/GUINN



0 152 0000 2273

LLOYD BENTSEN
TEXAS

4 892967

COMMITTEE:
FINANCE
COMMERCE, BUSINESS AND TRANSPORTATION
JOINT ECONOMIC
JOINT COMMITTEE ON TAXATION

United States Senate

WASHINGTON, D.C. 20510

June 14, 1989



PL
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C
S
RA

Mr. Craig DeRemer, Director
Office of Congressional Liaison
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. DeRemer:

I recently received the enclosed constituent inquiry, and I would very much appreciate your providing me with any pertinent information you might have regarding the matter, or any assistance you might be able to give in routing it to the proper authorities.

Your kind consideration is greatly appreciated.

Sincerely,

B

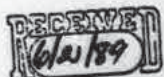
Lloyd Bentsen

Lloyd Bentsen

Enclosure

PLEASE REPLY TO:

961 Federal Building
Austin, Texas 78701
ATTN: Anne Mosher



0 152 0000 2274

SEN. BENTON 197 61
AS OUR SENATOR 5/14/84
REQUESTING YOU TO PERSUADE
THE EPA TO REINVESTIGATE
THE ABANDONED AMERICAN
CYANAMID CHEMICAL CO. PROPERTY
IN FORT WORTH, TX FOR CHEMICAL
AND/OR HAZARDOUS WASTES ASAP.
PLEASE REPLY AS WE ARE CONCERNED.
THANK YOU MARYS APS

CA57116

0 152 0000 2275

FROM HARMAN, Douglas City Manager, Fort Worth, TX			CONTROL NO.
SUBJECT AND DATE 5-11-89 Re the investigation of the American Cyanamid plant, Fort Worth, TX			DATE REC'D 6AX-173 3-22-89
			DUE DATE 6-5-89
REFERRED (1) Director 6H	(2) cc: 6E, 6C, 6A 6D	(3) <i>Colman / Trevitt</i> 5-24-89	(4)
DATE 5-22-89	REPLY SENT TO	DATE RELEASED 5/24/89	ACKNOWLEDGED - DATE <input checked="" type="checkbox"/> 5/24/89 <input type="checkbox"/> NO ANSWER NEEDED <input type="checkbox"/> (Explain in remarks)
REMARKS RA reply bcc: Gilleland, (6AX)			

EPA Form 5160-1 (6-72)
REPLACES FWPCA FORM 72 AND
NEW-73 WHICH MAY NOT BE USED.

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE

MAY 31 1989

Mr. Douglas Harmon
City Manager
Office of the City Manager
1000 Throckmorton Street
Fort Worth, Texas 76102

Dear Mr. Harmon:

This is in response to your letter of May 11, 1989, requesting clarification of the Environmental Protection Agency's (EPA) position regarding concerns and allegations raised pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of EPA in early 1980 by the U.S. Department of Labor. EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but ~~that~~ ~~hazardous wastes~~ were being stored in units consisting of container ~~and~~ tank storage areas. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983 at which time the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

As you are aware, allegations concerning past operating practices have been repeated. Due to these continuing concerns, EPA considered reinvestigating the site, utilizing its technical assistance team. However, no action was initiated after EPA was informed that the allegations were being investigated by your office. EPA has offered to provide your office with any necessary technical assistance for the purposes of this investigation.

Please be assured of the Agency's continuing interest in this matter.

Sincerely,

/s/ Joe D. Winkle

Robert E. Layton Jr., P.E.
Regional Administrator USA

bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H), Gilleland (6AX)

6H-CT:JTRUITT:tpc:05-18-89:5

6H-CT COLEMAN 6H-C BROWN 6H-S WILLIAMSON

no. 6H-292/6AX-173

File Code # please

5/30/89

0 152 0000 2277

MAY 31 1989

Mr. Douglas Harmon
City Manager
Office of the City Manager
1000 Throckmorton Street
Fort Worth, Texas 76102

Dear Mr. Harmon:

This is in response to your letter of May 11, 1989, requesting clarification of the Environmental Protection Agency's (EPA) position regarding concerns and allegations raised pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of EPA in early 1980 by the U.S. Department of Labor. EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but ~~that~~ ~~hazardous wastes~~ were being stored in units consisting of container ~~and~~ tank storage areas. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983 at which time the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

As you are aware, allegations concerning past operating practices have been repeated. Due to these continuing concerns, EPA considered reinvestigating the site, utilizing its technical assistance team. However, no action was initiated after EPA was informed that the allegations were being investigated by your office. EPA has offered to provide your office with any necessary technical assistance for the purposes of this investigation.

Please be assured of the Agency's continuing interest in this matter.

Sincerely,

/s/ Joe D. Winkle

Robert E. Layton Jr., P.E.
Regional Administrator ~~(SA)~~

bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H), Gilleland (6AX)

6H-CT:JTRUITT:tpc:05-18-89:5-6775

file code no.

control no. 6H-292/6AX-173

6H-CT COLEMAN
6H-C BROWN
6H-S WILLIAMSON

6H GERON
6H DAVIS

6X CHARLES 5/20/89

0 152 0000 2278

Mr. Douglas Harmon
City Manager
Office of the City Manager
1000 Throckmorton Street
Fort Worth, Texas 76102

Dear Mr. Harmon:

This is in response to your letter of May 11, 1989, requesting clarification of the Environmental Protection Agency's (EPA) position regarding concerns and allegations raised pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of EPA in early 1980 by the U.S. Department of Labor. EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but that hazardous wastes were being stored in units consisting of container and tank storage areas. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983 at which time the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

As you are aware, allegations concerning past operating practices have been repeated. Due to these continuing concerns, EPA considered reinvestigating the site, utilizing its technical assistance team. However, no action was initiated after EPA was informed that the allegations were being investigated by your office. EPA has offered to provide your office with any necessary technical assistance for the purposes of their investigation, since the Agency feels there is no need to conduct two distinct investigations.

Please be assured of the Agency's continuing interest in this matter.

Sincerely,

Allyn M. Davis
Director
Hazardous Waste Management Division (6H)
bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H)

6H-CT:JTRBTT:tpc:05-18-89:5-6775 file code no.

6H-C *CH* 6H-S 6X 6H
COLEMAN *BROWN* WILLIAMSON CHARLES GERSH

5/25 *BW* *5/24/89*

0152 0000 2279

CITY OF FORT WORTH, TEXAS



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

64X-173
6H
cc: 6E
6C
6A
6D

May 11, 1989

Mr. Robert E. Layton, Jr.
Regional Administrator
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, Texas 75202

Dear Mr. Layton:

The City of Fort Worth has been in contact with your agency regarding the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas. Recently a Channel 8 news reporter stated that the Environmental Protection Agency was prepared to have a Technical Assistance Team investigate the American Cyanamid plant site.

In an effort to resolve the issues, representatives and your agency on an almost daily basis over the last several weeks. If your agency feels the need to have a technical assistance team evaluate this site, please carry out this process. The City of Fort Worth wishes to encourage EPA to carry out whatever analysis you deem appropriate. In addition, I respectfully request your agency to provide a written explanation as to the position EPA has had in the past and currently has regarding the facility.

I want to assure you that our intention is to resolve the concerns on the American Cyanamid site and work both with your agency and the company in resolving this as soon as possible.

Your assistance in addressing this issue as well as any additional concerns you may have is openly accepted.

Sincerely,

Douglas Harman
City Manager

cc: E. Larry McMillen, Chief, Fort Worth Fire Department
Nick U. Curry, Director, Public Health Department
Gary Santerre, Director, Transportation and Public Works
Richard Sawey, Director, Water Department
David Ivory, Senior Assistant City Manager
Ruth Ann McKinney, Assistant City Manager
Bob Terrell, Assistant City Manager
Ramon Guajardo, Assistant City Manager
Alan Davis, U. S. Environmental Protection Agency, Region VI

CITY OF FORT WORTH, TEXAS
OFFICE OF THE CITY MANAGER
1000 THROCKMORTON BLVD.
FORT WORTH, TEXAS 76102
200634

6/1
LA

Robert Layton, Jr.
Regional Administrator
Environmental Protection Agency
Region VI
1445 Ross Avenue
Dallas, Texas 75202

PREPAID
FIRST CLASS



0827 0000 2010

0 132 0000 2281

Region 6

American Cyanamid Company, Fort Worth, Texas

ISSUE: What, if any, significant environmental problems exist at the American inactive American Cyanamid Company facility in Fort Worth, and what involvement should EPA have in investigating the situation?

TIMING: Immediate and ongoing.

CONCERNED GROUPS: EPA, Region 6, Texas Water Commission, Texas Highway Department, City of Fort Worth, U.S. Army, public interest groups.

BACKGROUND: Available information indicates that American Cyanamid Company's Fort Worth plant was constructed under the direction of the Chemical Construction Division of the company in 1942-43. The plant was operated initially by American Cyanamid for the Defense Corporation and produced fluid cracking catalyst for removal of excess nitrogen and sulphur from crude oil. The catalyst was used to produce aviation grade gasoline for the U.S. Armed Services during World War II.

Upon completion of the contract, American Cyanamid purchased the facilities and continued to produce fluid cracking catalyst. The major raw material for the process was bauxite ore and various other substances, including nickel, cobalt, vanadium, and molybdenum, were used to impregnate the catalyst for different results.

Three waste ponds (approximately 50'x70') were located at the facility and used in the treatment process at one time. Prior to 1964, the company discharged all wastewater to the Trinity River. At the time of an EPA inspection of the facility in 1980, the waste stream (containing nitric and sulfuric acid) was neutralized with caustic in an underground tank before going to one of the ponds for settling. Overflow was discharged to the City of Fort Worth Wastewater Collection System. Storm water, mixed with a portion of process water was discharged periodically (about 6-8 times a year) to the Trinity River. After storage in an underground tank, a copper and water waste stream was removed and disposed of by deep well injection off-site.

Hydrocyanic acid (HCN), also referred to as hydrogen cyanide, was apparently produced by American Cyanamid in California until 1955. The cylinders of HCN were distributed to other plants to sell to farmers for fumigation of grain silos. The company has indicated that no cylinders were stored at the Fort Worth plant since 1965.

American Cyanamid submitted to EPA a Notification of Hazardous Waste Activity on August 18, 1980. Additionally, the company submitted a Part A permit application on November 10, 1981, and was granted Interim Status to store hazardous wastes in tanks and containers. Those wastes

identified in the Part A include: spent solvents (F001-F003 and F005/container storage); chromium waste (D007/tank storage); and low pH wastes (D002/tank treatment). The treatment of the D002 waste was found to be excluded from RCRA, as treatment occurred in a primary neutralization tank, and was removed from the Part A on August 4, 1981. American Cyanamid ceased operation and clean closed all Interim Status hazardous waste management units in mid-1983. The permit application was formally withdrawn on April 30, 1984.

EPA conducted a Preliminary Assessment on the site in November 1979, and a Site Inspection in July 1980. The Site Inspection was conducted as a result of a referral from the Occupational Safety and Health Administration. We concluded in October 1982 that no further action was needed under Superfund because the facility was active and regulated under RCRA.

In June 1981, American Cyanamid submitted a notification for a hazardous waste site to EPA in accordance with section 103(c) of CERCLA. The company stated that 25 to 50 partially filled drums of vanadium containing catalyst had been buried on the site in 1972. However, in August of 1981, the company withdrew the earlier notification noting that the material was not listed or characteristic hazardous waste.

Over the years, numerous allegations have surfaced about handling and disposal of hazardous materials at the American Cyanamid facility. Secret operations by the Army, including production of nerve gas, have been rumored, but not substantiated. Numerous former employees reportedly have suffered serious illnesses. Some of the former employees have taken legal action against the company, but none have been settled.

One of the former employees who has pending legal action against American Cyanamid was interviewed by EPA in January 1981. As a result of that interview, EPA sent a RCRA 3007 letter to the company requesting information regarding disposal of hazardous wastes at the Fort Worth facility. The company's response questioned EPA's authority to seek information from the company under section 3007, but answered our questions anyway. The response added very little new information (only about the 25-50 drums mentioned above) and specifically stated that there was no evidence of any HCN cylinders being disposed of on-site.

CURRENT STATUS: The Texas State Highway Department is evaluating alternative alignments for State Highway 121 north of Downtown Fort Worth. One or more of the alternatives could pass through portions of the American Cyanamid property. One or more of the alternatives could also pass through portions of a historic neighborhood. The introduction of the historic preservation issue apparently has caused the questions about what is buried on the American Cyanamid property to resurface.

The City of Fort Worth had been in contact with American Cyanamid about addressing the issue even the current media storm commenced. The City

has now sped up the process and plans to meet with the company on May 4 or 5. The City apparently prefers to work with American Cyanamid to assess the situation, determine if any problems exist, and have the company conduct any cleanup that might be necessary.

Relative to RCRA, all hazardous waste management units are closed and the facility is inactive. Releases, should they have occurred, would appear to have originated from pre-RCRA land disposal units.

The Texas Water Commission has taken the position that there is no new information about the site. They acknowledge that some substances are still buried at the site but that they are not causing a problem.

The American Cyanamid site has not been ranked using the Hazard Ranking System model. However, based on available information, it does not appear that the site would be a potential NPL candidate (using either the current or proposed revised HRS) because of a lack of targets in the available pathways.

OPTIONS:

General

Monitor the investigation of the City of Fort Worth and provide technical review assistance if requested.

Superfund

1. Pre-remedial site inspection and HRS prescore analysis to follow up on previous investigation. This approach would allow us to gather more information, but the site does not appear to be a potential NPL candidate.
2. Preliminary assessment for emergency response action. This would allow us to gather information about what was buried at the site, but there appears to be no substantiated, or new, allegations about activities at the facility.
3. Enforcement action to force American Cyanamid to conduct a remedial investigation. Sufficient cause may be lacking.

RCRA

1. Section 3013 Order to require monitoring, testing, and reporting with respect to a site where a release of a hazardous waste has occurred. We do not know at this time whether a release of hazardous waste has occurred.
2. Section 3008(h) Order to require corrective action/investigation to be conducted at an Interim Status facility where a release of hazardous waste or hazardous constituents has occurred. As with 3013, we do not have conclusive evidence at this time.

KEY CONTACT: Allyn M. Davis, Director
Hazardous Waste Management Division
(214) 655-6700
(FTS) 255-6700
(214) 739-5025 (home)

Prepared by:
William Taylor
5-6740

0 182 0000 2384

Superfund File Chronology

- January 30, 1979 - Letter from Wallace Cooper, EPA to David Butterfield, American Cyanamid, regarding disposal of hydrocyanic acid (HCN) cylinder and thanking American Cyanamid for efforts to locate and properly dispose of same.
- February 12, 1980 - Preliminary Assessment of American Cyanamid facility by EPA, apparent Seriousness of problem identified as "none".
- March 10, 1980 - Final Strategy determination by EPA on facility, no apparent problem: no action needed.
- June 27, 1980 - Record of Communication regarding a telephone call from Mr. Kurtz, OSHA Dallas Regional Office, to Bob Forrest, EPA, advising EPA of allegations by former American Cyanamid employee of burial on company property of 2-3 HCN cylinders, vanadium pentoxide, copper compounds and other chemicals.
- July 17, 1980 - Memo from Gerald Fontenot, EPA, to Charlie Gazda, EPA, requesting an inspection of the facility based on the former employee's allegations.
- July 30, 1980 - Notice of Inspection of facility under Section 3007 of RCRA and Section 308 of FWPCA, Inspector Robert Hiller, EPA, Recipient Albert Hoff, American Cyanamid (samples collected).
- July 30, 1980 - Site Inspection Report by EPA (with Ecology and Environment, Inc.), apparent seriousness of problem identified as "low".
- August 11, 1980 - Memo Robert Hiller, EPA, to Charles Gazda, EPA, summarizing Site Inspection Report, references HCN cylinders distributed to plants to sell to farmers but no cylinders at Fort Worth plant since 1955.
- August 12, 1980 - Letter Richard B. Tabakin, Coordinator Environmental Science, American Cyanamid to Dr. William Langley, Chief Houston Lab, EPA, requesting that only soluble fraction of samples be determined and that EPA advise the company of the method being used.
- August 26, 1980 - Memo from U.S. Department of Labor, Fort Worth Area Office, to Ray Lozano, EPA, transmitting results of analyses of soil samples taken as a part of an OSHA investigation. Vanadium, copper, molybdenum, nickel, and lead detected in samples from surface around former disposal areas, and in drainage ditch leading from property.
- September 1, 1980 - Letter Charles Gazda, EPA to Richard A. Tabakin, American Cyanamid advising him that total metals would be determined.

- September 30, 1980 - Memo William D. Langley, EPA Houston Lab, to William J. Librizzi, EPA, Director S & A Division, transmitting results of analyses for selected metals of samples taken from facility on July 30, 1980, as part of a Site Inspection. Elevated levels of cobalt, copper, lead, molybdenum, mercury, nickel, and zinc were found in Trinity River sediment at the facility discharge pipe.
- October 31, 1980 - Notes to file from Dr. Bill McAnalley, EPA, on water criteria for cobalt, copper, lead, molybdenum, nickel and mercury.
- November 6, 1980 - Letter Gerald Fontenot, Chief, Hazardous Materials Enforcement Section, to Albert W. Hoff, Plant Manager, American Cyanamid transmitting sample analyses results.
- November 20, 1980 - Notes from meeting with American Cyanamid, participants not stated.
- January 20, 1981 - Memo from Jim Turner, EPA, to Bill Hathaway, EPA regarding
 1) information from Arthur Berkley, former employee at the facility, about waste disposal at the site ("no startling new allegations") and
 2) development of a RCRA 3007 letter to American Cyanamid. Attachments, 1) Notes from Arthur Berkley, 2) list of substances, 3) drawing of site by Berkley and Russ Bartley, and 4) cassette tape.
- January 26, 1981 - RCRA 3007 letter from Diana Dutton, Director, Enforcement Division, EPA, to American Cyanamid Company requesting information on disposal of hazardous wastes at the Fort Worth facility.
- February 20, 1981 - Letter from H.J. Mitchell, Acting Plant Manager, American Cyanamid Company, to Diana Dutton, EPA, responding to 1-26-81 RCRA 3007 request. Response questions EPA's authority under 3007 to seek information from the company, but answers questions anyway. Answers:
 1) Hazardous wastes managed onsite were corrosive process wastes, small quantities of ignitable solvents used in maintenance, chromium containing liquid waste (none of which are buried on-site) and off-grade phthalic anhydride catalyst sold under the tradename PAA, composed of silica substrate impregnated with vanadium pentoxide (some of which may have been buried on-site), 2) Other waste materials buried were neither listed nor characteristic RCRA hazardous wastes; 3) no hazardous wastes known to be buried relative to certain sources specified in EPA's letter, 4) no evidence of HCN cylinders being buried on-site.
- June 1, 1981 - Letter from H. Mitchell, Acting Plant Manager, American Cyanamid Company to EPA, Region 6 transmitting the June 5, 1981 hazardous waste site notification.
- June 5, 1981 - CERCLA 103(c) notification of hazardous waste site signed by H. Mitchell, Acting Plant Manager identifying waste as 25 to 50 partially filled drums of vanadium-containing catalyst (listed waste P 120).

August 4, 1981 - Letter Hershel J. Mitchell, Acting Plant Manager, American Cyanamid Company, to EPA, Region 6, withdrawing the June 5, 1981, notification of hazardous waste site based on 1) the waste not being pure or off-specification vanadium pentoxide and not a listed hazardous waste and, 2) the waste is not RCRA characteristic hazardous waste.

July 7, 1982 - Fort Worth Star Telegram Article titled "Dust to dust: 5 men suing company."

October 5, 1982 - Final Strategy determination by EPA, site is active RCRA facility. Refer file to RCRA, no action needed.

January 14, 1986 - Letter Dick Whittington, P.E., Regional Administrator, EPA, Region 6, to U.S. Senator Phil Gramm providing brief history and stating that EPA and TWC believe based on available information "that there has been no hazardous waste activity at this site."

RCRA File Chronology

August 18, 1980 - Notifications.

November 10, 1980 - Part A application.

July 24, 1981 - Letter from EPA stating Part A had been received and outlining Interim Status requirements.

August 4, 1981 - Amendment of Part A from American Cyanamid to exclude primary neutralization Tank.

June 30, 1982 - Letter on financial test for financial assurance from American Cyanamid.

July 12, 1982 - Letter on corporate demonstration for insurance from American Cyanamid.

August 19, 1982 - Letter from EPA to American Cyanamid concerning submittal of financial information to states.

May 17, 1983 - Letter submitting closure plan to EPA for facility. Closure plan identifies drum and tank storage.

1984 (Exact date unknown) - Affidavit of Exclusion from Hazardous Waste Permitting Requirement. Permit not required due to closure of facility.

April 30, 1984 - Letter from the Texas Water Commission to American Cyanamid confirming withdrawal of permit.

0 152 0000 2200

It's
good for
you!!

LETTER WITH ↓
EPA ID LAD008017261*

7/18/82 LET
LoHos 7/15/82 IC
Date 7/15/82

Name American Cyanamid

An EPA review of the attached financial information indicates the following:

☒ Material appears to be in order.

☐ The following deficiencies have been noted:

Closure-postclosure

- ☐ No closure-postclosure information submitted
- ☐ Trust fund does not meet required wording of Paragraph 264.151(a)
- ☐ Surety bond does not meet required wording of Paragraph 264.151(b)
- ☐ Letter of credit does not meet required wording of Paragraph 264.151(d)
- ☐ Insurance policy does not meet required wording of Paragraph 264.151(e)
- ☐ Fails financial test for closure
- ☐ Fails financial test for postclosure
- ☐ Original signatures do not appear on documentation
- ☐ Letter from chief financial officer does not meet required wording of Paragraph 264.151(f)
- ☐ Corporate guarantee does not meet required wording of Paragraph 264.151(g)
- ☐ Inadequate/missing CPA audit of financial statement and/or accountant's opinions
- ☐ Fails to address all U.S. facilities
- ☐ Fails to include closure/postclosure cost estimates
- ☐ Insufficient/missing CPA special report
- ☐ Other _____

Liability

- ☐ No liability information submitted
- ☐ Insurer not qualified
- ☐ Insurance certificate does not meet required wording of Paragraph 264.151(j)
- ☐ Insurance endorsement does not meet required wording of Paragraph 264.151(i)
- ☐ Policy limits are beneath RCRA minimums
- ☐ Policy not in effect by required date
- ☐ Original signatures do not appear on documentation
- ☐ Fails financial test for liability
- ☐ Letter from chief financial officer does not meet required wording of Paragraph 264.151(g)
- ☐ Inadequate/missing CPA audit of financial statement and/or accountant's opinions
- ☐ Fails to address all U.S. facilities
- ☐ Original signatures do not appear on documentation
- ☐ Other _____

Also pertains to LAD008061089, LAD008175390



American Cyanamid Company
Wayne, NJ 07470

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



TX
LA

July 12, 1982

Regional Administrator
Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, Texas 75270
Attention: RCRA Financial Requirements

Gentlemen:

American Cyanamid Company (or one of its subsidiaries) operates plants in your region which are subject to regulation as treatment, storage or disposal facilities under the Resource Conservation & Recovery Act (RCRA). These plants are listed in the attached Certificate of Insurance.

Cyanamid chooses to demonstrate compliance with the requirements of 40CFR264.147 and 40CFR265.147, which call for proof of liability insurance covering sudden and accidental releases at these RCRA facilities, by providing the attached Certificate of Insurance for these facilities to your office.

We believe that this submittal fulfills all of Cyanamid's present responsibilities and obligations under this aspect of these regulations.

If you have any questions regarding this submittal, please contact the undersigned at (201) 831-3261.

Very truly yours,

AMERICAN CYANAMID COMPANY

T. A. Caldwell, Jr.

Director, Corporate Insurance

TAC:kr
Attachment



TX
LA

American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

June 30, 1982

Regional Administrator
Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, Texas 75270



Gentlemen:

I am the chief financial officer of American Cyanamid Company, One Cyanamid Plaza, Wayne, New Jersey 07470. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (For further description of the facilities see Table II attached.)

<u>EPA Region</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>
I	\$ 603,500	\$1,860,000
II	12,062,400	765,000
III	1,721,600	936,000
IV	1,583,924	1,296,000
V	2,721,800	750,000
VI	592,200	204,300
VII	250,000	75,000
VIII	0	0
IX	36,750	0
X	11,000	0
Grand Total	\$19,583,174	\$5,886,300

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: (For further description of the facilities see Table II attached.)

<u>EPA Region</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>
I W. Springfield, Mass.	\$ 11,000	\$ 0
II Carolina and Manati, Puerto Rico and Clifton, N.J.	71,088	0
IV Memphis, Tenn.	2,350	0
V Evandale, Ohio	125,000	300,000
IX Sierra, California	48,000	300,000
	\$257,438	\$600,000

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: Included in paragraphs 1 and 2 above.
4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: Included in paragraphs 1 and 2 above.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

ALTERNATIVE II

- | | |
|--|------------------|
| 1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) | \$ 26,326,912 |
| 2. Current bond rating of most recent issuance of this firm and name of rating service | Aa-3- Moody's |
| 3. Date of issuance of bond | September, 1981 |
| 4. Date of maturity of bond | September, 1984 |
| * 5. Tangible net worth | \$1,513,457,000. |
| * 6. Total assets in U.S. (required only if less than 90% of firm's assets are located in U.S.) | \$1,972,825,000. |

	YES	NO
7. Is line 5 at least \$10 million?	X	
8. Is line 5 at least 6 times line 1?	X	
9. Are at least 90% of firm's assets located in the U.S.? If not complete line 10.		X
10. Is line 6 at least 6 times line 1?	X	

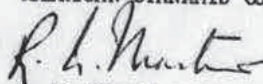
0 152 0000 2293

-3-

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

AMERICAN CYANAMID COMPANY



R. L. Martino
Vice President

Dated June 30, 1982

RLM/hm
0002b/3422b

Attachment

0 192 0000 2294

TEXAS DEPARTMENT OF WATER RESOURCES
1700 N. Congress Avenue
Austin, Texas

TEXAS WATER DEVELOPMENT BOARD

Louis A. Beecherl, Jr., Chairman
George W. McCleskey, Vice Chairman
Glen E. Roney
W. O. Bankston
Lonnie A. "Bo" Pilgrim
Louie Welch



Charles E. Nemir
Executive Director

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Lee B. M. Biggart
Ralph Roming

April 30, 1984

Mr. M. A. Taylor, President
American Cyanamid Company
600 North Jones Street
Fort Worth, Texas 76106

Dear Sir:

Re: American Cyanamid Company, Application No. 10103, Registration
No. 30023, 600 North Jones Street, Fort Worth, Texas site

We have reviewed Part A - Facility Background Information for the above
referenced site and also the Affidavit of Exclusion which was recently
submitted for the purpose of withdrawing the hazardous waste permit ap-
plication from further consideration in accordance with the exclusion
claimed.

Based on our review of Part A and the Affidavit of Exclusion, the
application for a hazardous waste permit has been withdrawn. We are
retaining certain portions of the Part A for incorporation into your
solid waste registration file.

If I may be of further assistance, please do not hesitate to contact
me.

Very truly yours,

Charles Eanes

Charles Eanes
Permit Control & Reports

cc: HQ District 4
EPA - TXD008017261

4/30/84 NBS

*Close Date
4/30/84
1105 = 6*

*OK FILE
5/31/84
GB*



American Cyanamid Company
600 North Jones Street
Fort Worth, TX 76106
(817) 332-2127

May 17, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U. S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75270

Re: RCRA I.D. No. TXD00817261

Dear Sir:

American Cyanamid Company announced on May 13, 1983 its intent to discontinue production at its Fort Worth, Texas plant due to business reasons. This has precipitated the need to initiate the plant RCRA closure plan, a copy of which is attached, so that the plant can be closed by not later than June 30, 1983. We will forward documentation of closure of the hazardous waste management areas after the closure is completed.

Please contact me at telephone (817) 332-2127 if you have any questions on this submittal.

Very truly yours,

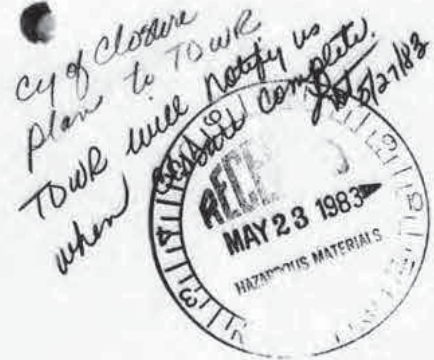
AMERICAN CYANAMID COMPANY

F. J. Goletz
F. J. Goletz
Plant Manager

FJG/pf

Attachment

Cc: Mr. Jay Snow, Director
Texas Department of Water Resources
1700 North Congress Avenue
P. O. Box 13087, Capitol Station
Austin, Texas 78711



0132 0000 2296

INCLUDE DESIGN CAPACITY. MODELS OR FOR DESCRIBING OTHER PROCESSES (104) FOR EACH PROCESS EN

Line No.	Process Code	Explanation
1	S01	Waste is accumulated in 55 gallon drums.
2	S01	Below grade concrete neutralization tank.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. **EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

1. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



SEE LETTER IN FILE TXD 00 801 7261

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET
DALLAS, TEXAS 75270

TXD 00 801 7261

AUG 14 1982

Mr. T. A. Caldwell Jr.
Director, Corporate Insurance
American Cyanamid Company
One Cyanamid Plaza
Wayne, New Jersey 07470

Dear Mr. Caldwell:

Thank you for your recent submittal of the required documentation to show compliance with the Resource Conservation and Recovery Act (RCRA) financial regulations, 40 CFR 265, Subpart H, as amended on April 7, 1982, 47 FR 16032, and April 16, 1982, 47 FR 16544. The Environmental Protection Agency (EPA) Region VI has authorized the States of Arkansas, Louisiana, Oklahoma, and Texas to operate separate RCRA programs in lieu of the EPA program. Appropriate contacts in these states are:

Ms. Sandra Perry
Arkansas Department of Pollution
Control and Ecology
P. O. Box 9583
Little Rock, Arkansas 72219

Mr. Gerald D. Healy, Jr.
Administrator
Office of Environmental Affairs
Hazardous Waste Division
P. O. Box 44066
Baton Rouge, Louisiana 70804

Mr. Don Hensch
Oklahoma State Department of Health
Hazardous Waste Division
P. O. Box 53551
Oklahoma City, Oklahoma 73152

Mr. Robert Brydson
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Therefore, it is necessary for you to provide documentation directly to each of these states to comply with their laws and regulations.

If you have any questions, please call Henry Onsgard at (214) 767-2630 or me at (214) 767-2645.

Sincerely yours,

Stan Jorgenson

R. Stan Jorgenson, Chief
Hazardous Materials Branch

cc: Arkansas Department of Pollution Control and Ecology
Oklahoma State Department of Health
Louisiana Office of Environmental Affairs
Texas Department of Water Resources

RCRA File

0 132 0000 2298

RCRA Consolidated Permits Program (This information is required under Section 3005 of RCRA.)

FTXDO08017261

FOR OFFICIAL USE ONLY

APPLICATION APPROVED DATE RECEIVED (yr., mo., & day)

COMMENTS

FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (Place an "X" below and provide the appropriate date.)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (Place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
AND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
	T04	GALLONS PER DAY OR LITERS PER DAY

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	H
METRIC TONS PER HOUR	M
GALLONS PER HOUR	E
LITERS PER HOUR	N
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	D

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	45,870	G		7				
2	S02	116,000	G		8				
	S01	1,000,000	G		9				
4					10				

0 152 0000 2299

EPA 3510-3 (8-80) (enter from page 1)										FOR OFFICIAL USE ONLY									
WTX D 008017261										W DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
1 CZ	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES								
											1. PROCESS CODES (enter)								
										2. PROCESS DESCRIPTION (if a code is not entered in D(1))									
1	P	1	2	0	125				T	S 0 1									
2	F	0	0	1	2,750				P	S 0 1									
3	F	0	0	2						Included with above									
4	D	0	0	7	960,000				P	S 0 2									
5	D	0	0	0	1,500,000				T	S 0 1									
6																			
7																			
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0 192 0000 2300



FORT WORTH PLANT
EPA I.D. NO. TXD00817261

CLOSURE PLAN

Introduction

Hazardous waste activities at the Fort Worth plant consist of three operations: (1) a drum storage area (designated S01) where drums of hazardous waste are accumulated and stored prior to off-site disposal, (2) a storage tank (designated S02) where a chromium containing process waste is accumulated and stored, and (3) a concrete tank in which plant wastewater is neutralized prior to discharge to the local POTW.

Drum Storage Area

All drums of hazardous waste will be shipped off-site to an approved secure landfill. Any contaminated soil in the 3750 square foot storage area will be excavated and drummed for off-site disposal at a secure landfill.

Storage Tank

The contents of the 113,000 gallon tank will be checked for chromium content by atomic adsorption spectrophotometric methods. If the contents contain 5 mg/l or more of chromium they will be shipped off-site for disposal and the tank will be decontaminated by triple rinsing with water. The final rinse will be checked for chromium content and, if necessary, the decontamination procedure will be repeated until no hazardous waste residues remain in the tank.

Neutralization Tank

The contents of the concrete neutralization tank will be checked for pH. If the pH is less than pH 2.0 or greater than pH 12.5, they will be neutralized and disposed of by discharge to the POTW. The tank will then be triple rinsed with water and the final rinse will be checked for pH to assure it is non-corrosive and thus confirm that no hazardous waste residues remain in the tank.

Closure Schedule

The useful lives of the heretofore mentioned tanks, pit drum storage area and associated conveyance systems are considered to terminate during the first quarter of the year 2010. The closure plan as outlined above would be implemented within 30 days of receipt of the final volume of wastes and would provide that all facilities could be safely closed within 180 days after such implementation.

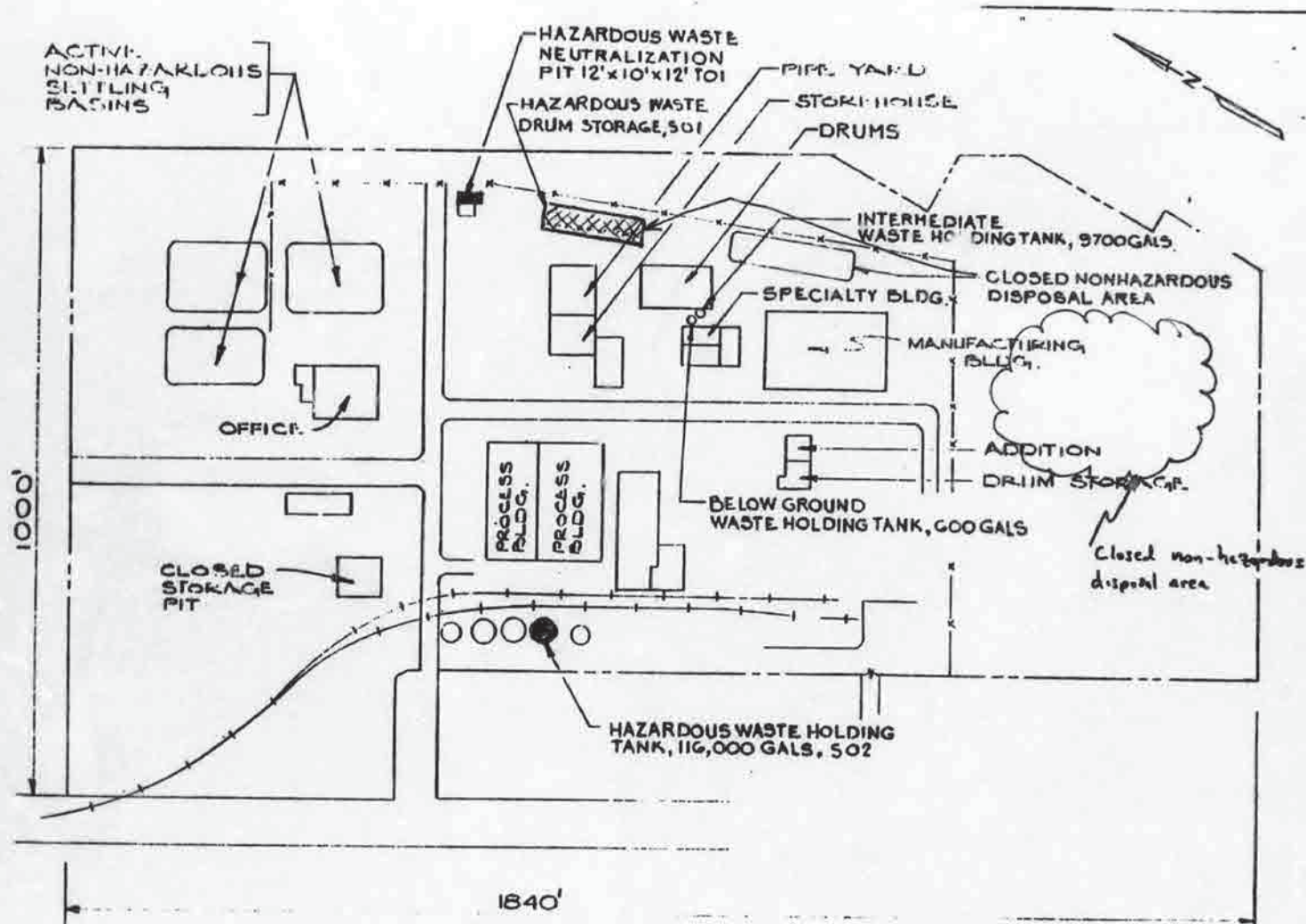
0 192 0000 2301

Post-Closure

No post-closure monitoring of hazardous waste facilities is planned for the Fort Worth Plant. All contaminated facilities are to be either decontaminated or removed for off-site disposal, therefore no residual hazardous wastes would be released following closure.

Closure Cost

The Closure cost estimated for the Fort Worth Plant is \$25,000. Attached is the Closure Plan for an explanation of the closure procedures.



WALDEMAR S. NELSON AND COMPANY
INCORPORATED
ENGINEERS AND ARCHITECTS
1200 ST. CHARLES AVE. NEW ORLEANS, LA.

FORTH WORTH PLANT
AMERICAN CYANAMID CO.

LOCATION PLAN
SCALE: 1"=200'

0 192 0000 2303

POOR QUALITY DOCUMENT

FORM 3, HAZARDOUS WASTE PERMIT APPLICATION
EPA I.D. NO. TXD008017261

VI. PHOTOGRAPHS



Drum Storage Area, S01 (15 Oct. 1980)



Holding Tank, 116,000 Gallons, S02 (15 Oct. 1980)

0192 0000 2304

POOR QUALITY DOCUMENT

FC 3. HAZARDOUS WASTE PERMIT APPLICATION

I.D. NO. TXD00817261

VI. PHOTOGRAPHS (Cont.)



Neutralization Sump, 12' x 10' x 12', T01
(15 Oct. 1980) (Sump is just to the right
of the cooling tower)



American Cyanamid Company
800 North Jones Street
Fort Worth, TX 76106
(817) 332-2127

August 4, 1981

CERTIFIED MAIL
Return Receipt Requested

*Change
3-11-82*

EPA Region VI
Department 6 AEP
1201 Elm Street
First International Building
Dallas, TX 75270

Re: American Cyanamid Company
Fort Worth Plant
EPA I.D. No. TXD008017261

Dear Mr. Woods:

In our Part A application for a hazardous waste permit submitted November 14, 1980, we included treatment facilities which have subsequently been exempted by the regulations. Specifically, process code T01 on line 3 of item III (on page 1 of form 3) and waste code D002 on line 5 of item IV (on page 3 of form 3) refer to the neutralization of wastes, which are characterized as hazardous only because of corrosivity, carried out in a concrete neutralization tank. We believe that this specific system is subject to the "elementary neutralization unit" exemption outlined in the November 17, 1980 Federal Register (45 FR 76074-76075) and request that our permit be modified by removing this tank from the classification of a hazardous waste treatment facility.

Revised affected pages of the application, based on the aforementioned changes, are attached. Please advise if there are any questions.

Yours very truly,

Hershel J. Mitchell
Acting Plant Manager



HM/pf

Attachments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET
DALLAS, TEXAS 75270

July 24, 1981

American Cyanamid Company
Attn: Albert Hoff
600 North Jones
Fort Worth, Texas 76106

EPA ID NUMBER: TXD 00 801 7261

FACILITY LOCATION: 600 North Jones
Fort Worth, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely,

Diana Dutton, Director
Enforcement Division (6E)

cc: Texas Department of Water Resources

0 192 0000 2307

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date prepared: July 24, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location and EPA identification number:

Name: American Cyanamid Company
Location: 600 North Jones
Fort Worth, Texas
EPA ID No: TXD 00 801 7261

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265:

Owner's name: American Cyanamid Company
Operator's name: American Cyanamid Company

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated:

<u>Process Code</u>	<u>Design Capacity Amount</u>	<u>Unit of Measure</u>
<u>T01</u>	<u>1,080,000.</u>	<u>Gallons per day</u>
<u>S02</u>	<u>116,000.</u>	<u>Gallons</u>
<u>S01</u>	<u>45,870.</u>	<u>Gallons</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid wastes exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers:

<u>P120</u>	<u>F001</u>	<u>F002</u>	<u>D007</u>	<u>D002</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

EPA Region VI, Dallas, TX 75270
(214) 767-2765

0 152 0000 2300

Part A, Permit Process --- Internal Checklist

ID Number TXD008017261 Inst Name American Cyanamid Co.

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid Prmig Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	<u>MS</u>	___	
3	Form 1 received?	<u>MS</u>	___	
1	Form 3 received?	<u>MS</u>	___	
1 & 3	Postmarked on or before November 19, 1980?	<u>MS</u>	___	
3	Date of operation entered?	<u>MS</u>	___	
3	Date of operation on or before November 19, 1980?	<u>MS</u>	___	
Notif. record	Notifier?	<u>MS</u>	___	
	Notified on or before August 18, 1980?	<u>MS</u>	___	
1	Form 1, XIII B signed?	<u>MS</u>	___	
3	Form 3, IX B Signed?	<u>MS</u>	___	

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: _____)

PHASE TWO

1	Unsure if regulated or non-regulated?	___	___
3	New facility?	___	___
1 & 3	Core items missing? If Yes, indicate which items: Facility name___; location___; mail address___; operator info___; certification___; process info___; waste info___; owner___; sigs___.		

PHASE THREE

1 & 3	Non-core items missing? If Yes, indicate which items: Maps___; photos___; drawings___; lat/long___. Other observations and comments:
-------	--

Log out/Log in
on reverse side.

Received Date Stamp
80-11-18
(Stamp forms also)

0152 0000 2307

OUT

IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)	CHARGED TO (PERSON & OFFICE)	DATE CHARGED OUT
A 012	Key Punch	6-3-81

OPTIONAL FORM 33
FEB 1962
GSA Circular No. 259

CHARGEOUT RECORD
5010-101

GPO 142-15-00070-1 200-000

DATE CHARGED OUT	CHARGED TO (PERSON & OFFICE)	IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)

OUT

0152 0077 2310

CONTINUED FROM THE FRONT

VH-100 (Rev. 10-1-79) (In order of priority)	
A. FIRST	
2, 8, 1, 9 (specify)	Catalyst and catalyst substrate
B. SECOND	
C. THIRD	
D. FOURTH	
VH-1 OPERATOR INFORMATION	
A. NAME	
AMERICAN CYANAMID COMPANY	
B. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)	
F - FEDERAL S - STATE P - PRIVATE	M - PUBLIC (other than federal or state) O - OTHER (specify)
P	(specify)
C. PHONE (area code & no.)	
201 831 2000	
D. STREET OR P.O. BOX	
BERDAN AVENUE	
E. CITY OR TOWN	
WAYNE	
F. STATE	
NJ	
G. ZIP CODE	
07470	
H. HUMAN LAND	
Is the facility located on human land?	
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
I. EXISTING ENVIRONMENTAL PERMITS	
A. WPCD (Discharges to Surface Water)	
B. PSD (Air Emissions from Proposed Sources)	
C. UIC (Underground Injection of Fluids)	
D. OTHER (specify)	
X - 725 (specify)	
Texas Clean Air Act	
E. OTHER (specify)	
C - 56 (specify)	
Texas Air Control Board	
Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.	
F. A. NATURE OF BUSINESS (provide a brief description)	
The American Cyanamid Company's Fort Worth Plant manufactures hydrotreating petroleum and chemical process catalysts.	
F9: A/51	
VH-1 CERTIFICATION (See Instructions)	
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my knowledge of those persons immediately responsible for obtaining the information contained in this application, I believe that the information is true, correct and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.	
A. NAME & OFFICIAL TITLE (Type or print)	
W. G. Paxton, President	
Chemical Products Division	
B. SIGNATURE	
C. DATE SIGNED	
11/10/82	

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 character)

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permit Program
(Read the "General Instructions" before starting.)

Form Approved OMB No. 158-R0175

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I. EPA I.D. NUMBER FTXD008017261		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space first the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
II. POLLUTANT CHARACTERISTIC INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of hold-faced terms.			
III. NAME OF FACILITY 1 SKIP AMERICAN CYANAMID COMPANY			
IV. FACILITY CONTACT A. NAME & TITLE (last, first, & title) 2 HOFF ALBERT PLANT MANAGER		B. PHONE (area code & no.) 817 332 2127	
V. FACILITY MAILING ADDRESS A. STREET OR P.O. BOX 3 600 NORTH JONES			
B. CITY OR TOWN 4 FORT WORTH		C. STATE TX	
D. ZIP CODE 76106			
VI. FACILITY LOCATION A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5 600 NORTH JONES			
B. COUNTY NAME TARRANT			
C. CITY OR TOWN 6 FORT WORTH		D. STATE TX	
E. ZIP CODE 76106			

Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Line No.	Process Code	Explanation
1	S01	Waste is accumulated in 55 gallon drums.
3	T01	Below grade concrete neutralization tank.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	900	900	P	T-01-D-0-0-0	
X-2	200	200	P	T-01-D-0-0-0	
X-3	200	200	P	T-01-D-0-0-0	
X-4	100	100	P	T-01-D-0-0-0	
					included with above

0152 0000 2313

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 character/line).

Form Approved OMB No. 158-S80004

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FORM 3 RCRA	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			F	T	X	D	0	0	8	0	1	7	2	6

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)
A	801118

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
		UNIT OF MEASURE CODE			UNIT OF MEASURE CODE
GALLONS		G	LITERS PER DAY		V
LITERS		L	TONS PER HOUR		D
CUBIC YARDS		Y	METRIC TONS PER HOUR		W
CUBIC METERS		C	GALLONS PER HOUR		E
GALLONS PER DAY		U	LITERS PER HOUR		H
ACRE-FEET		A	HECTARE-METER		F
ACRES		B	HECTARES		Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
X-1	S-0-2	600	G		5				
X-2	T-0-3	20	E		6				
1	S-0-1	45,870.000	G		7				
2	S-0-2	116,000.000	G		8				
3	T-0-1	1,080,000.000	U		9				
4					10				

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

Line No.

EPA Waste No.

1

P120

Includes off grade vanadium containing catalyst stored pending recovery as well as a minor amount of empty raw material bags.

EPA I.D. NO. (enter from page 1)													
F	T	X	D	0	0	8	0	1	7	2	6	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

FG: 55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FG: 56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3 2 4 5 5 7 0
55 56 57 58 59 60

0 9 7 2 0 8 0 0
73 74 75 76 77 78

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER				2. PHONE NO. (area code & no.)			
E				F			
3. STREET OR P.O. BOX				4. CITY OR TOWN		5. ST.	
F				G		6. ZIP CODE	

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
W. G. Paxton, President Chemical Products Division	<i>W. G. Paxton</i>	11/10/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

0152 0000 23 15

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 155-S80004

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W	T	X	D	0	0	8	0	1	7	2	6	1	3	1	W	DUP	3	DUP	
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
NO.	HAZ. WASTE NO. (enter code)	ESTIMATED ANNUAL QUANTITY OF WASTE	UNIT OF MEASURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
1	P 1 2 0	125,000	T	S 0 1															
2	F 0 0 1	2,750,000	P	S 0 1															
3	F 0 0 2																Included with above		
4	D 0 0 7	960,000.000	P	S 0 2															
5	D 0 0 2	820,000.000	T	T 0 1													removed 3-11-82		
6	D 0 0 2	820,000.000	T	T 0 1															
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26																			

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

PAGE 3 OF 5

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)



600 North Jones
Fort Worth, TX 76106

TXD-00801-7261

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 14, 1980

EPA Region VI
Attn: 6 AEP
1201 Elm Street
First International Bldg.
Dallas, TX 75270

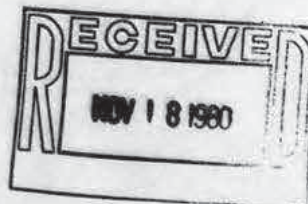
Dear Mr. Woods:

Attached herewith is Part A, Application for a Hazardous Waste Permit for the Fort Worth plant submitted in accordance with the regulations contained in EPA's Consolidated Permits Program.

This submission or any past or future discussions or communication with respect to this matter is not intended to admit any liability or to waive any rights.

Very truly yours,


Albert Hoff
Plant Manager



0 152 0000 23 77

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EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

FORM I. EPA GENERAL INFORMATION

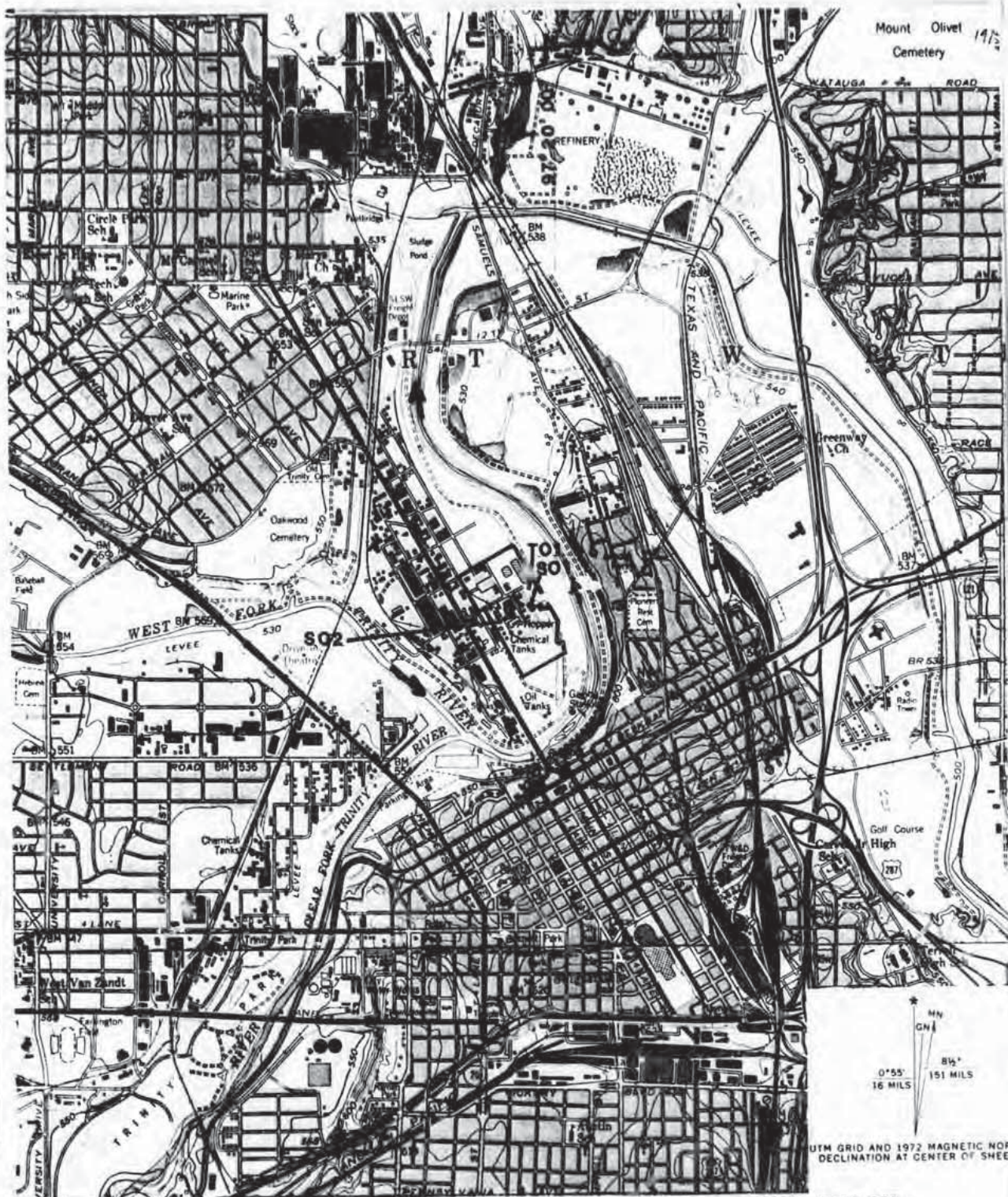
EPA I.D. NO. TXD008017261

II. Pollutant Characteristics

*The Fort Worth Plant submitted an NPDES permit application for approval on September 23, 1980.

X. Existing Environmental Permits (continued)

3660	Texas Air Control Board
R-1457	Texas Air Control Board
R-393	Texas Air Control Board
POTW-69	Fort Worth Water Department
30023-TX	Texas Department of Water Resources



LEGEND
Property Line —

LOCATION MAP
AMERICAN CYANAMID COMPANY
FORT WORTH PLANT

SCALE 1:24,000
1000 0 1000 Ft.

USGS MAPS: Haltom City, TX
Fort Worth, TX

DATE PERIOD 3-11-82
REMARKS 3-17-82



ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE DATA MANAGEMENT SYSTEM
FACILITY MAINTENANCE FORM

HAZARDOUS WASTE DATA MANAGEMENT SYSTEM
FACILITY MAINTENANCE FORM

1. FACILITY NAME: 17X00080126013 TOI

2. FACILITY ADDRESS: 10800000013

3. FACILITY TYPE: HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL

4. FACILITY STATUS: ACTIVE

5. FACILITY OPERATOR: 10800000013

6. FACILITY CONTACT PERSON: 10800000013

7. FACILITY CONTACT PHONE: 10800000013

8. FACILITY CONTACT FAX: 10800000013

9. FACILITY CONTACT E-MAIL: 10800000013

10. FACILITY CONTACT OTHER: 10800000013

11. FACILITY MAINTENANCE HISTORY

DATE	DESCRIPTION	STATUS
3-11-82	HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL	ACTIVE
3-17-82	HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL	ACTIVE



17 5/23/82 Entered 6/7/82

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Print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-07

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY	
INSTALLATION'S EPA I.D. NO.	TXD008017261
I. NAME OF INSTALLATION	AMERICAN CYANAMIDE COMPANY
II. INSTALLATION MAILING ADDRESS	600 N JONES FORT WORTH TX 76106
III. LOCATION OF INSTALLATION	600 N JONES FORT WORTH TX 76106

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY	
COMMENTS	
C	
15 16	
INSTALLATION'S EPA I.D. NUMBER	APPROVED
FTXD008017261	800818
000004	
I. NAME OF INSTALLATION	
AMERICAN CYANAMIDE COMPANY	
II. INSTALLATION MAILING ADDRESS	
STREET OR P.O. BOX	
3600 NORTH JONES	
CITY OR TOWN	
FORT WORTH	
ST. ZIP CODE	
TX 76106	
III. LOCATION OF INSTALLATION	
STREET OR ROUTE NUMBER	
5600 North Jones	
CITY OR TOWN	
Fort Worth	
ST. ZIP CODE	
TX 76106	
IV. INSTALLATION CONTACT	
NAME AND TITLE (last, first, & job title)	
2 HOFF A W Plant Manager	
PHONE NO. (area code & no.)	
817-332-2127	
V. OWNERSHIP	
A. NAME OF INSTALLATION'S LEGAL OWNER	
8 AMERICAN CYANAMIDE CO.	
B. TYPE OF OWNERSHIP (enter the appropriate letter into box)	
F - FEDERAL M - NON-FEDERAL	
VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))	
A. GENERATION B. TRANSPORTATION (complete item VII) C. TREAT/STORE/DISPOSE D. UNDERGROUND INJECTION	
VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))	
A. AIR B. RAIL C. HIGHWAY D. WATER E. OTHER (specify):	
VIII. FIRST OR SUBSEQUENT NOTIFICATION	
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.	
A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)	
C. INSTALLATION'S EPA I.D. NO.	
TXD008017261	
IX. DESCRIPTION OF HAZARDOUS WASTES	
Please go to the reverse of this form and provide the requested information.	

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.21 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
10	11	12	13	14	15
16	17	18	19	20	21
22	23	24	25	26	27
28	29	30	31	32	33
34	35	36	37	38	39
40	41	42	43	44	45
46	47	48	49	50	51
52	53	54	55	56	57
58	59	60	61	62	63
64	65	66	67	68	69
70	71	72	73	74	75
76	77	78	79	80	81
82	83	84	85	86	87
88	89	90	91	92	93
94	95	96	97	98	99

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.22 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

12	13	14	15	16	17
18	19	20	21	22	23
24	25	26	27	28	29
30	31	32	33	34	35
36	37	38	39	40	41
42	43	44	45	46	47
48	49	50	51	52	53
54	55	56	57	58	59
60	61	62	63	64	65
66	67	68	69	70	71
72	73	74	75	76	77
78	79	80	81	82	83
84	85	86	87	88	89
90	91	92	93	94	95
96	97	98	99		

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.23 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48
49	50	51	52	53	54
55	56	57	58	59	60
61	62	63	64	65	66
67	68	69	70	71	72
73	74	75	76	77	78
79	80	81	82	83	84
85	86	87	88	89	90
91	92	93	94	95	96
97	98	99			

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.24 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

89	90	91	92	93	94
95	96	97	98	99	

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. INSTANTLY
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D004)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my knowledge of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Aw Hoff

NAME & OFFICIAL TITLE (type or print)

Plant Manager

DATE SIGNED

7/22/80



American Cyanamid Company
Industrial Chemicals Division
Wayne, NJ 07470

August 12, 1980

TXD 008017261

EPA Region VI
ATTN: 6AEP
1201 Elm Street
First International Building
Dallas, TX 75270

Reference: American Cyanamid Company
Fort Worth, TX Plant
TXD 008017261

Dear Sir:

Please find attached the Notification of Hazardous Waste Activity, EPA Form 8700-12, for American Cyanamid Company's Fort Worth, TX plant.

Please advise if any further information is required.

Very truly yours,

R.B. Tabakin

R. B. Tabakin
Coordinator, Environmental
Science

RBT/meh
ATTACHMENT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



0132 0000 2324

Form A, revised GSA No. 10-5-2-1-16
GSA No. 0246-EPA-OT

Please print or type with ELITE type (character inch) in the unshaded areas only.



ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS	

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F T Y D 0 0 0 8 3 8 9 0 4 2 1		8 0 9 8 1 8

000121

I. NAME OF INSTALLATION
YANAMID DISTRIBUTION CENTER

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX
3 1 2 4 5 VICEROY DRIVE

CITY OR TOWN
4 DALLAS

ST. ZIP CODE
TX 7 5 2 4 7

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER
5 1 2 4 5 VICEROY DRIVE

CITY OR TOWN
6 DALLAS

ST. ZIP CODE
TX 7 5 2 4 7

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)
2 HUNTER M G DIST. CENTER MANAGER

PHONE NO. (area code & no.)
2 1 4 - 6 8 8 - 1 7 8 1

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER
8

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)
F - FEDERAL
M - NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
☒ A. GENERATION
☒ C. TREAT/STORE/DISPOSE
☐ B. TRANSPORTATION (complete item VII)
☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))
☐ A. AIR
☐ B. RAIL
☐ C. HIGHWAY
☐ D. WATER
☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION
☐ B. SUBSEQUENT NOTIFICATION (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

C. INSTALLATION'S EPA I.D. NO.
8

0 152 00000 2325

I.D. - FOR OFFICIAL USE ONLY									
WTX D000 0838 908 21									
13 14 15									

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

<input checked="" type="checkbox"/> 1. IGNITABLE (D001)	<input type="checkbox"/> 2. CORROSIVE (D002)	<input type="checkbox"/> 3. REACTIVE (D003)	<input type="checkbox"/> 4. TOXIC (D004)
---	--	---	--

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>M. G. Hunter</i>	NAME & OFFICIAL TITLE (type or print) M. G. Hunter, Dist. Center Manager	DATE SIGNED 8-15-80
----------------------------------	---	------------------------

0 152 0000 2326

Please print or type with ELITE type (characters/inch) in the unshaded areas only.

Form Approved GSA No. 155-570-16
GSA No. 0246-EPA-OT



ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.	
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	
III. LOCATION OF INSTALLATION	

PLEASE PLACE LABEL IN THIS SPACE

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C	
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INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr, mo, & day)
		8/09/81

000121

I. NAME OF INSTALLATION	
YANAMID DISTRIBUTION CENTER	

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX	
31245 VICEROY DRIVE	

00-083-8904

CITY OR TOWN	ST.	ZIP CODE
DALLAS	TX	75247

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER	
51245 VICEROY DRIVE	

CITY OR TOWN	ST.	ZIP CODE
DALLAS	TX	75247

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 HUNTER MG DIST. CENTER MANAGER	214-688-1781

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER	
8	

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F - FEDERAL M - NON-FEDERAL	<input checked="" type="checkbox"/> A. GENERATION <input checked="" type="checkbox"/> C. TREAT/STORE/DISPOSE <input type="checkbox"/> B. TRANSPORTATION (complete Item VII) <input type="checkbox"/> D. UNDERGROUND INJECTION
--------------------------------	--

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

<input checked="" type="checkbox"/> A. FIRST NOTIFICATION <input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete Item IX)	C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



American Cyanamid Company
Wayne, NJ 07470

August 15, 1980

This location is a warehouse and distribution center which handles a wide variety of commercial products. Some of these products could qualify as hazardous wastes under RCRA when it becomes necessary to dispose of them.

As is true of any such activity, a small quantity of waste material, including waste which could be classified as hazardous wastes under RCRA, is occasionally generated at this location via damaged containers.

To the best of our knowledge, no such generation of hazardous wastes under RCRA has occurred at this site during the preceding ninety (90) days. However, the future frequency and extent of such generation events cannot be reasonably predicted.

It is our understanding that, although such future generation events may occur only very infrequently, and although the quantities of hazardous waste so generated might be well within any small quantity generator exclusion limits established by the EPA, we may be required by 261.5(d) to have interim status as a treatment/storage/disposal facility under RCRA in order to conduct the normal activities incidental to the clean up and disposal of any hazardous wastes so generated.

Accordingly, we are submitting the enclosed Notification of Hazardous Waste Activity and requesting Part A of the application in order to obtain interim status under RCRA as a treatment/storage/disposal facility.

The certification in the enclosed Notification is made in light of the above approach to this matter.

Very truly yours,

AMERICAN CYANAMID COMPANY

Enclosure



American
Genomics
R.D.
4/11/88

DATA CHANGES

EPA IDENTIFICATION NUMBER/C101=12												TWC #/C116=6				PREPARER				DATE							
7-0008017261																H				4-8-88							
Facility Name/C104=40																											
Mailing Address/C106=30																											
City/C107=25												ST/C108=2				Zip/C109=5											
Facility Contact Person/C105=30																Ownership Code/C102											
Location Address/C110=30																ST Dist/C115=2											
City/C111=25												ST/C2=2				Zip/C112=5											
Owner's Name/C1503=40																											
GEN TRN TSD UIC				C1105				C305				Other				Other				Telephone/C113=10							
												C119 = 1				C =											
Waste Codes to be added/C2701												Waste Codes to be deleted/C2701															
Process Codes- Add - Delete - Change																											
C1801=3				C1802=13								C1803=1				C1804=1											
C1801=3				C1802=13								C1803=1				C1804=1											
C1801=3				C1802=13								C1803=1				C1804=1											
Other Coding as necessary																											

Entered by: _____ Date Entered: _____ QC: 4/18/88 File Code: II.B.1

0132 0000 2329

AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING REQUIREMENT

Registration No. 30023
Application No. 10103 TXD 008017261
(Dept. Use Only)
Facility Name _____
County of _____

M. A. Taylor being duly sworn, deposes and says:

I am President, Chemical Products Division, having responsibility for American
Title (Owner or Principal Officer) Facility Owner
Cyanamid Company's Ft. Worth, TX Plant; 600 North Jones Street; Ft. Worth, TX 76106.
and Address

This affidavit is being executed for the purpose of notifying the Executive Director of the Texas Department of Water Resources that the named facility does not require a hazardous waste permit because:

Check appropriate box(es):

- ☐ No hazardous waste is stored, processed or disposed on-site
- ☐ The facility qualifies for the "Accumulation Time" storage exclusion of Texas Administrative Code, Section 335.69
- ☐ The facility qualifies for the "Small Quantity Generator" exclusion of Texas Administrative Code, Section 335.2(e)
- ☐ The facility qualifies for the "Elementary Neutralization Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ The facility qualifies for the "Wastewater Treatment Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☒ Other (Explain with an attachment and reference TDWR rule) This facility has been closed in accordance with an approved closure plan. The facility no longer stores, processes, or disposes of hazardous waste.

Sworn to before me this
16th day of December, 1988.

M. A. Taylor
Signature M. A. Taylor

Katrina Churchill
Notary Public in and for

Passaic County, N. J.

My commission expires October 19, 1985

Del Gen
Del TSD
Chg C119 EQ 3
Remove Part A
Remove Process codes

0152 0000 2331

TEXAS DEPARTMENT OF WATER RESOURCES



NEW

X
C.S.
WPM

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME: American Cyanamid Company PHONE: (214) 4469383
SITE ADDRESS: 600 N Jones St, Fort Worth, Tx ZIP: COUNTY: Tarrant

TOWR PERMIT OR REGIS. NO. 30023 EPA ID NO. TX0008017261

INDUSTRY NAME AMERICAN DISTRICT 04 DATE REPORT SUBMITTED 0484

TYPE OF FACILITY 12 MAJOR/NONMAJOR N TYPE OF EVALUATION EV

DATE OF EVALUATION OR ENFORCEMENT REFERRAL 03-22-84

Types Of Violations	Deg.	Date Of Notif. Letter	Date Of Inf. Enf. Act.	Date Response Due	Date Of Actual Compliance	Resolved/Unresolved
GWM						
INC						
CLO						
FIN						
PTB						
MAN						
SCH						
OTH	3		03-22-84	04-15-84		U

COMMENTS:

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45 49 51 53 55 59 61 63 65 69 71 73 75 79 81 83 85 89 91 93

*02 closure pending; certification being reviewed.

NUMBER OF SAMPLES: -

0 102 0000 2332

TEXAS DEPARTMENT OF WATER RESOURCES



RECEIVED

JUN 11 '84

Update

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME: American Cyanamid Company

PHONE: (214) 4469383

SITE ADDRESS: 600 N Jones St, Fort Worth, Tx

ZIP: _____

COUNTY: Tarrant

TOWR PERMIT OR REGIS. NO. 30023

EPA ID NO. TX0008017261

INDUSTRY NAME AMERICAN

DISTRICT 04

DATE REPORT SUBMITTED 0484

M O F Y

0484

TYPE OF FACILITY

G F T
12

MAJOR/NONMAJOR

N

TYPE OF EVALUATION

EY

DATE OF EVALUATION OR ENFORCEMENT REFERRAL

03-22-84

Types Of Violations

Deg.

Date Of Notif. Letter

Date Of Inf. Enf. Act.

Date Response Due

Date Of Actual Compliance

Resolved/Unresolved

GWM

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04-15-84

04-17-84

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04-17-84

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NUMBER OF SAMPLES: _____

TOWR 0814 (Rev. 10-26-83)
see 1 of 2

WORK NO.: 9091

SUBMITTED BY: Christopher J. Jarama

0 192 0000 2333

10 P 333 852 669
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO	
American Cyanamid Co.	
STREET AND NO.	
P.O., STATE AND ZIP CODE	
TPO 00 801 7261	
POSTAGE	\$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
OPTIONAL SERVICES	
RETURN RECEIPT SERVICE	
SHOW TO WHOM AND DATE DELIVERED	¢
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	\$
POSTMARK OR DATE	

PS Form 3800, Apr. 1976

STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)

1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, leaving the receipt attached, and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified-mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in Item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

GPO: 1980 331-003

**ENVIRONMENTAL PROTECTION AGENCY
FINDS CORE ELEMENT MAINTENANCE FORM**

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FACILITY IDENTIFICATION NUMBER	FACILITY ADDRESS	COUNTY NAME	
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FACILITY IDENTIFICATION NUMBER										FACILITY CITY										STATE			ZIP CODE		COUNTY CODE													
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AN CYANAMID CO
ORTH TX

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RC NT VOL 02

TXD008017261 0002
ICAN CYANAMID CO
WORTH, TX 76106



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RCRA RECORD CENTER
Infilling Cover Sheet

NAME _____

MAIL CODE 64-CT

PHONE _____

DATE 7/11/94

EPA I.D.#	FACILITY NAME	TYPE FILE
TXD008017261	American Apexamid	Env.

0152 0000 2338

THE MUTUAL FIRE, MARINE and INLAND INSURANCE COMPANY
(In Rehabilitation)

CENTRE SQUARE
17TH FLOOR - EAST TOWER
1500 MARKET STREET
PHILADELPHIA, PA 19102
(215) 567-9600
FAX (215) 567-9300

HON. CYNTHIA M. MALESKI
REHABILITATOR

ALEXANDER BRATIC
SPECIAL DEPUTY

VINCENT VACCARELLO
ASST. SPECIAL DEPUTY

RCRA
TEXAS SECTION



December 23, 1992

FIRST CLASS MAIL

CLAIM NUMBER: RD 01262
POLICY NUMBER: EL 100027
POC NUMBER: 52151
DATE OF LOSS: 6/30/76
NAME OF INSURED: American Cyanamid
NAME OF CLAIMANT: USEPA Sonics Int'l Site
Ranger, TX

1 Sandra P. Spooner, Esq.
Deputy Director
Commercial Litigation Branch
Civil Division
Dept. of Justice
P.O. Box 875
Ben Franklin Station
Washington, DC 20044

1 American Cyanamid
One Cyanamid Plaza
Wayne, PA 07470

NOTICE OF DETERMINATION

The Class 4 claim filed on behalf of the claimant identified above against the Company has been denied as filed. The claim has been determined by the Company in an amount not to exceed \$ 0. The reason for this determination is:

- ☐ Denial of Coverage ☒ Denial of Loss Value ☐ Denial of Liability
- ☐ Claim Has Been Paid In Full
- ☒ Value Of The Claim Is Below The Insured's Deductible Or Policy Layer
- ☐ The Claim Was Fully Satisfied By A Co-defendant
- ☐ The Litigation Was Dismissed Against the Insured
- ☐ The Statute of Limitations Ran Prior To Litigation Being Filed
- ☐ Other

IF EITHER THE CLAIMANT OR THE INSURED/POLICYHOLDER DOES NOT ACCEPT THIS DETERMINATION, SUCH PERSON MAY FILE AN OBJECTION WITH THE COMMONWEALTH COURT OF PENNSYLVANIA, THE WIDENER BUILDING, 1339 CHESTNUT STREET, SUITE 990, PHILADELPHIA, PA 19107, WITHIN SIXTY (60) DAYS FROM THE DATE OF MAILING OF THIS NOTICE. A COPY OF ALL OBJECTIONS MUST BE FILED WITH THE REHABILITATOR, C/O

0192 0000 2339

THE MUTUAL FIRE, MARINE and INLAND INSURANCE COMPANY

(In Rehabilitation)

CENTRE SQUARE
17TH FLOOR - EAST TOWER
1500 MARKET STREET
PHILADELPHIA, PA 19102
(215) 567-9600
FAX (215) 567-9300

HON. CYNTHIA M. MALESKI
REHABILITATOR

ALEXANDER BRATIC
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ASST. SPECIAL DEPUTY

December 23, 1992

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Ranger, TX

3 USEPA
Air & Hazardous Materials Div.
1201 Elm Street
Dallas, TX 75270

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0 152 0000 2340

THE MUTUAL FIRE, MARINE AND INLAND INSURANCE COMPANY
(In Rehabilitation)

Page Two

MUTUAL FIRE, MARINE AND INLAND INSURANCE COMPANY (IN REHABILITATION), DEPT. NOD, CENTRE SQUARE, 17TH FLOOR - EAST TOWER, 1500 MARKET STREET, PHILADELPHIA, PA 19102 WITHIN THE SIXTY (60) DAY PERIOD.

IF NO OBJECTION IS FILED WITH THE COURT AND SERVED ON THE REHABILITATOR WITHIN SIXTY (60) DAYS OF THE DATE OF THIS NOTICE, ALL RIGHTS TO OBJECT TO THE AMOUNT OF THIS CLAIM DETERMINATION ARE WAIVED AND THE COMPANY'S DETERMINATION, AS SET FORTH ABOVE, SHALL BE FINAL AND SHALL LIMIT THE COMPANY'S MAXIMUM LIABILITY TO THE CLAIMANT AND THE INSURED POLICYHOLDER TO THE AMOUNT OF THE DETERMINATION.

THIS NOTICE OF CLAIM DENIAL IS ISSUED PURSUANT TO THE COMPANY'S PLAN OF REHABILITATION APPROVED BY THE COMMONWEALTH COURT OF PENNSYLVANIA. IF NO OBJECTION IS TIMELY AND PROPERLY FILED, THE COMPANY'S DETERMINATION SHALL BE BINDING AND ENFORCEABLE ON THE CLAIMANT AND THE INSURED/POLICYHOLDER AND SHALL RELEASE THE COMPANY FROM ALL LIABILITY TO THE CLAIMANT AND THE INSURED/POLICYHOLDER, AND SHALL RELEASE THE INSURED/POLICYHOLDER FROM ALL LIABILITY TO THE CLAIMANT, IN EXCESS OF THE CLAIM DETERMINATION SET FORTH HEREIN.

THIS NOTICE IS NOT AN OFFER OF SETTLEMENT. RATHER, THE NOTICE SETS FORTH THE REHABILITATOR'S DETERMINATION OF THE MAXIMUM VALUE OF THE CLAIM AND LIABILITY TO THE ESTATE. INFORMATION RECEIVED AND EVENTS THAT OCCUR SUBSEQUENT TO THE ISSUANCE OF THIS NOTICE MAY REDUCE THE AMOUNTS ULTIMATELY PAID, IF ANY, ON THIS CLAIM.

FOR CLAIMS IN EXCESS OF \$10,000 COURT APPROVAL IS REQUIRED BEFORE THE AMOUNT OF THIS DETERMINATION MAY BE PAID. ALL PAYMENTS WILL BE MADE IN ACCORDANCE WITH THE PLAN OF REHABILITATION BASED ON THE AVAILABILITY OF FUNDS FOR THE PAYMENT OF CLASS IV CLAIMS.

The Plan of Rehabilitation requires that you keep us informed of any change of address so we are able to keep in touch with you as this matter evolves.



Frank J. Johann
Claims Evaluator

FJJ:cr

0152 0000 2341

V. 2 OF 2

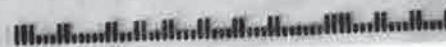
THE MUTUAL FIRE, MARINE and INLAND INSURANCE COMPANY
CENTRE SQUARE
17TH FLOOR - EAST TOWER
1500 MARKET STREET, PHILADELPHIA, PA 19102



6H-C

USEPA
Air & Hazardous Materials Div.
1201 Elm Street
Dallas, TX 75270

USEPA01 752701325 IN 12/31/92
RETURN TO SENDER
NO FORWARD ORDER ON FILE
UNABLE TO FORWARD
RETURN TO SENDER





FEDERAL EXPRESS

American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

III
TX D000 8017261 March 23, 1990

Mr. Jerry Truitt
Region VI - Texas Section
Mail Code 6 HCT
1445 Ross Avenue
Dallas, Texas 75202



RE: CYANAMID'S FT. WORTH PLANT SITE
INVESTIGATION AND RISK ASSESSMENT

Dear Mr. Truitt:

Enclosed is a copy of the Site Investigation and Risk Assessment report prepared by Roy F. Weston for American Cyanamid's Ft. Worth facility.

We are also enclosing a News and Information release on the report and background information. These documents were prepared for release to the public during a joint news conference, with the City of Ft. Worth, scheduled on Monday, March 26, 1990 at 2:00 PM in the City Manager's Office.

Please contact either me or Mr. Anton C. Marek of Cyanamid at 201-831-2000 with any questions or additional information regarding this subject.

Very truly yours,

R. C. Merrell
Environmental Project Manager

RCM:gh
Enc.



News & Information

Public Affairs Division
Wayne, NJ 07470 (USA)

contact

Linda Heimburg
201-831-2224

FOR IMMEDIATE RELEASE

FORT WORTH, TEXAS -- March 26, 1990 -- The results of a soil and groundwater sampling program conducted at the former American Cyanamid catalyst manufacturing facility by Roy F. Weston, Inc., independent environmental consulting engineers, showed that materials buried on site do not pose a risk to human health or the environment.

"The city is pleased that Cyanamid has taken the extra step to evaluate the site," said Rick Hay, assistant to the city manager. "The results show that the materials known to be on the site are not toxic nor do they pose a threat to the community."

Cyanamid and the city agreed to the site investigation six months ago, which included sampling surface soils, soils below ground, storm water runoff and groundwater in more than 30 areas in and around the plant site.

"The materials buried on site are non hazardous and are located in well-defined areas," said Tony Marek, manager of commercial environmental services. "As shown in the site investigation, they do not tend to leach into the environment. In accordance with state regulations, we intend to leave the materials undisturbed in their present locations."

0-122 0000 2345

The company is removing asbestos from the site, and demolition work will continue throughout the year.

Cyanamid is a research-based biotechnology and chemical company which discovers and develops medical, agricultural, chemical and consumer products and manufactures and markets them around the world.

90-2231(3)



News & Information

Public Affairs Division
Wayne, NJ 07470 (USA)

contact:

Linda Heimburg
(201) 831-2224

Fort Worth Plant Background Paper

According to Cyanamid records, the Fort Worth plant was built by Defense Plant Corporation in the 1940s at the request of the United States government to manufacture cracking catalyst. This was considered a strategic material used in the production of petroleum products for the war effort.

Cyanamid purchased the facility in 1946 and continued operating it as a petroleum refinery catalyst plant until the plant closed in 1983 when it became unprofitable to continue to manufacture refining catalyst for a declining oil industry.

The facility was closed according to federal and state guidelines under the Resource Conservation and Recovery Act (RCRA), which guidelines require that such closures be protective of human health and the environment. Copies of these closure plans are filed with the EPA Region V in Dallas and the Texas State Water Commission.

ENVIRONMENTAL ISSUES

During the history of the plant, it was industrial practice to dispose of certain materials on site in accordance with existing environmental regulations.

Cyanamid believes that any materials buried on its Fort Worth site do not pose a hazard.

Catalyst manufactured at the site consisted of non-hazardous silica/aluminum substrate into which trace quantities of heavy metals may be impregnated depending on production requirements. Cyanamid manufactured catalysts containing nickel, vanadium pentoxide, copper, molybdenum and cobalt. These metals bind to the catalysts and do not tend to leach into the environment.

On closure of the plant site, the company hired independent consultants to determine the environmental impact of its closed facility. Four groundwater monitoring wells were drilled and monitored between 1981 and 1983. The consultants determined that the quantities of vanadium and copper present did not impact the Trinity River or the environment. Heavy metals may be present in minute quantities but they are bound on the alumina substrate and would not tend to leach into the environment. The groundwater data supports this conclusion.

1. We believe that a landfill in the northeast section of the plant contains 25 to 50 partially filled drums containing non-hazardous off-grade phthalic anhydride catalyst (PAA). This PAA catalyst is composed of alumina substrate impregnated with vanadium pentoxide and possibly copper. It does not pose a threat to human health or the environment.

2. A small area adjacent to the bird sanctuary contains a closed non-hazardous waste landfill containing miscellaneous plant debris and some off-specification alumina catalyst substrate. We do not believe that this area poses an environmental concern.

3. There may be some minor seepage of non-hazardous caustic material from beneath the concrete pads supporting several empty tanks. The tanks previously were used for storage of caustic and sodium silicate which were used as raw materials. This caustic seepage washed into the plant's storm water collection system during rain storms where it is neutralized prior to discharge to the Trinity River under the storm water discharge permit issued by the Texas Water Commission and the EPA. This seepage is non-hazardous as the pH level is below the hazardous level of 12.5 units established by the EPA. Since the underlying soils have a low permeability, the caustic seepage is confined.

4. Approximately 7,000 cubic yards of non-hazardous sodium sulphate (gypsum "salt cake") remained on site in a contained location at

0-152 0000 2349

the time of closure in 1983. This material was found to be wet below the crusted surface and difficult to remove. Approximately 2,000 cubic yards were removed in 1984 and 1985 to a non-hazardous landfill prior to becoming too wet to handle.

Cyanamid is planning to eventually remove the balance of this salt cake, estimated to be approximately 5,000 cubic yards. Analytical results documenting the non-hazardous nature of this salt cake have been provided to the Texas Water Commission.

5. The Cyanamid Fort Worth plant never produced hydrogen cyanide (HCN) or "nerve gas". The plant was used as a central collection center during a company recall of HCN cylinders in 1977-78, which were then taken off site for disposal. HCN was widely used in the midwest as a fumigant in silos and grain elevators for insect and rodent infestations.

Contrary to published reports, we do not believe that a leaking HCN cylinder was detoxified on the Fort Worth plant site sometime in the mid-50s. Existing Cyanamid records indicate, and former employees confirm, that no cylinders containing HCN have ever been buried on site.

Possible confusion could be attributed to a drum containing calcium cyanamide which was detoxified by treatment with cupperous ferrous sulphate and soda ash rendering a non-hazardous sodium salt.

PROPOSED HIGHWAY

Cyanamid company officials met with the Texas State Highway Department concerning the proposed route for the Southwest Freeway in the early 1980s. At that time, the highway department was concerned that taking part of the Cyanamid property would create a hairpin curve that could lead to an increase in traffic accidents.

Due to this circumstance it was the opinion that the highway department was exploring alternative routes for the planned Southwest Freeway.

Recent comments by a design engineer in the Texas Highway Department indicated that other concerns have prompted a re-alignment of the Southwest Freeway away from the Cyanamid property. These concerns include the interchange at Belnap, impact on the Pioneer Rest Cemetery and a small park.

At no time was Cyanamid notified that access was impractical due to environmental concerns pertaining to its Ft. Worth facility.

COMPANY PLANS FOR THE SITE

Cyanamid has hired a contractor to remove asbestos from piping, process equipment and buildings on the site and demolish the remaining buildings to prepare the site for possible sale or development.

0132 0000 2351

FACT SHEET
UPDATE
American Cyanamid
Ft. Worth, Texas
EPA ID# TXD008017261

ENF. 1

Background

On May 9, 1989, a press conference was held to discuss issues pertaining to allegations raised by former employees of the company. Participants included EPA Region 6 and a local ABC affiliate (Channel 8).

It was later found that interviews were conducted on May 9, 1989, with both the company and the City of Ft. Worth. During these interviews employees of Channel 8 informed city and company officials that by taking the lead in the investigation the city had precluded EPA from taking an action at the site.

Phone conversations on May 10, 1989, between EPA, the city, and the company in which the interview was discussed.

New Information

As a result of the press conference, RCRA staff were directed to address some specific concerns:

1. Groundwater data- The investigation was conducted by American Cyanamid and was not required by TWC or the EPA. The investigation consisted of the installation of four monitoring wells, one upgradient and three down gradient of the site. The wells were sampled for pH, specific conductance, copper, vanadium, and floc. Well #2 located immediately down gradient of the landfill exhibited a specific conductance approximately three times that found in the upgradient well (well #1).
2. Park area/bike trail near site- The city has no knowledge of a recreational area that borders the site, but are investigating to confirm this. Samples were taken by the City Health Dept. in April of 1988. These samples (7) were taken just outside the eastern boundary of the plant on property owned by the Tarrant County Water District. Results of these samples have shown off-site contamination (Cadmium 3.02ppm, Chromium 73.43 ppm, Copper 394.38 ppm, Lead 309.09 ppm, Nickel 484.53 ppm).
3. Protocol for acquiring information from DOD- Headquarters has said that correct protocol for acquiring information about DOD activities at the site would be a standard information request letter pursuant to Section 3007 of RCRA. When asked who the appropriate contact would be EPA Headquarters felt that the Assistant Secretary of the Army should be the recipient of the letter. Discussions with the Corps of Engineers has shown that the site is not believed to have ever been owned by the Federal Government although records indicate that the Federal Government did at one time hold a lien against the property for a loan made to American Cyanamid to purchase the site in the early 1940s.

RCRA File Chronology

1984 (Exact date unknown)

1. Affidavit of Exclusion from Hqs Waste Permitting Requirement
Date ~~7-1984~~
Permit not required due to closure of facility.
2. Letter To: Amer. Cy. From TWC date 4-30-84
Confirming withdrawal of permit
3. 4-19-82 EPA - AC. concerning submittal of financial information to states.
4. 5-17-83 Letter submitting closure plan to EPA for facility.
Closure plan identifies drum and tank storage
5. 7-12-82 Ltr Corporate demonstration for insurance from A. C.
6. 6-30-82 Ltr financial test for financial assurance from A. C.
7. 8-4-81 Amendment of Part A from AC to exclude primary neutralization Tank
8. 7-24-81 Letter from EPA stating Part A had been received ~~by EPA~~ and outlining Interim Status requirements.
9. Part A ~~was~~ signed 11/10/80
10. Notifications

0192 0000 2353

American Cyanamid Company
Contracts

- American Cyanamid Company
RAY MERZELL, ENVIRONMENTAL PROJECT
MANAGER (WAYNE, NEW JERSEY)
201-831-2873
- City of Fort Worth
RICK HAY, ASSISTANT TO THE CITY
MANAGER
817-870-6095
- TEXAS WATER COMMISSION
DON EUBANK, DUNCANVILLE OFFICE
214-298-6171
- TEXAS HIGHWAY DEPARTMENT
BILLY HARDIE, DISTRICT DESIGN ENGINEER
817-292-6510
- U.S. Army Corps of Engineers
BOB BEHN
817-? (Jim Highland would have it)

(2)

EPA

PRESLEY HATCHER, SUPERFUND SITE
ASSESSMENT SECT 6740

JERRY TRUITT, NEPA PERMITS
BRANCH 6775

JIM MULLINS, EMERGENCY RESPONSE
BRANCH 2270

BENNETT STOKES REGIONAL
COUNSEL 2120.

JIM HIGHLAND FEDERAL FACILITIES
COORDINATOR 2260.

WALT HELMICK SURVEILLANCE
BRANCH (GEOPHYSICS) 6491

Toxic waste inquiry to be reopened

BY J. LYNN LUTHERFORD
Fort Worth Star-Telegram

The Environmental Protection Agency said yesterday that it is reopening an investigation of assertions that tons of hazardous waste are buried under the old American Cyanamid chemical plant in Fort Worth.

The allegations, raised for years by former employees in lawsuits against American Cyanamid Co., recently caused the Texas Department of Highways and Transportation to alter its plans for a section of the proposed Southwest Freeway to avoid the 34-acre site.

The plant, which closed in 1962, is less than a mile north of the Tarrant County Courthouse.

EPA spokesman Roger Meacham said yesterday that officials at his agency have reopened an investigation that

(More on PLANT on Page 10)

Plant / From Page 1

was closed in 1980 after it was determined that any chemicals that may be buried were not dangerous to the public.

"We are looking into it again," Meacham said. "We decided we needed to re-evaluate our position about a week ago after some newspaper and television stories brought up some serious allegations."

He said earlier this month that if waste was buried at the site, it probably was done while such activity was legal. Former workers have said large amounts of toxic material were buried during a period after 1946.

Meacham said that the agency would like to talk to Arthur Berkley, a former employee who said he was ordered to bury tons of waste at the plant during the 29 years he worked for American Cyanamid.

"We hope he can give us specific information about where these materials are supposed to be buried," Meacham said. "Before we can do anything, we have to have more than allegations."

Among the chemicals Berkley said he saw buried was at least one cylinder of deadly hydrogen cyanide gas and thousands of barrels of a heavy-metal catalyst used to refine oil.

Berkley has said the chemicals were buried in several spots around the plant, including an area that was later covered by a building.

Berkley is one of at least five employees who has sued the company, asserting that maladies including chronic lung disease, heart attacks and damage to the brain and central nervous system were caused by prolonged exposure to the chemicals. Berkley's suit is pending in federal court.

"You name it, we buried it out there," Berkley told the Star-Telegram last week. "Some of that stuff was so bad that I would get nauseated, start

through a conservation fund established by Congress for some sites.

Meacham said EPA officials are still trying to determine if the plant would qualify for federal money because American Cyanamid is still in business as one of the largest chemical companies in the nation. Most federal money is reserved for sites that have been abandoned by defunct companies.

Berkley was out of town yesterday and could not be reached. His attorney and friend, Jim Jamison, said, "I'm sure Mr. Berkley would be more than happy to cooperate."

"In the late '70s we attempted to get

an order allowing us access to the plant and it was turned down with objections from American Cyanamid," Jamison said. "I'm sure a lot of people are interested in what is there."

Assistant Fort Worth City Manager Rick Hay said yesterday that he has not spoken with EPA officials.

The city has been in contact with American Cyanamid officials, who say they are ready to cooperate in a joint effort to find out what is buried at the plant and then take steps to clean it up.

Hay and officials from the chemical company said they hope a meeting can

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Section 1, Page 26

Fort Worth Star-Telegram

Editorials/Viewpoints

James Carter, President-Publisher, 1988-1995 James Carter Jr., Publisher, 1995-1997

Michael L. O'Connor President and Publisher

David B. Thibault	Editor and Vice President	Michael Macdonald	Executive Editor
Johnny Davidson	Editorial Page Editor	Gay Linnings	Managing Editor/News
Ann Thompson	Op-Ed Page Editor	Conrad Brundt	Managing Editor/Operations

Paul J. Beeson Associate Executive Editor

Publisher Prices Spot news photography, 1995; Metropolitan Public Service, 1995

THURSDAY am
4-27-89

Waste dump

The sooner area is probed, the better

Both possible outcomes of an investigation into the contents of the abandoned American Cyanamid chemical-waste burying ground would be good for Fort Worth.

If a thorough probe of the chemical-waste dump uncovers no substances that pose a hazard to the public health and safety, the community can breathe easier and the Texas Department of Highways and Public Transportation can pursue an alignment for the northern leg of the Southwest Freeway that will not sacrifice historic buildings on Samuels Avenue.

If some toxic peril is found at the site on the near North Side, less than a mile from the Tarrant County Courthouse, steps can be taken to eliminate the danger. Such a cleanup would involve some industrial costs — by some estimates as much as \$30 million — but such a price tag is immaterial compared to the value of the lives of this community's residents.

We are intrigued that the figure of \$30 million has been tossed around so authoritatively. That suggests that someone has a reasonably good idea about the contents of the landfill and what would be involved in removing them and rendering the site harmless.

That suspicion is reinforced by assertions of former employees of the plant who have filed lawsuits claiming that serious maladies they have suffered result-

ed from prolonged exposure to the chemicals they buried. Those infirmities include chronic lung disease, heart attacks and damage to the brain and central nervous system.

One of those former employees has said that he saw at least one cylinder of deadly hydrogen cyanide gas and thousands of barrels of a heavy-metal catalyst used in oil refining buried there.

If that is true, the chemical company could stand to pay some heavy damages and share in the cost of the cleanup. That would explain American Cyanamid's resistance over the years to efforts by the state, the city and the Environmental Protection Agency to find out what is buried at the site.

In the wake of recent publicity about the toxic-waste dump, the company now says that it is ready to cooperate with the city in a probe of the landfill and a cleanup operation, if necessary. At the same time, the EPA is reassessing its previous position that the site contains nothing dangerous to the public.

In conjunction with the Texas Water Commission, the EPA is considering using sophisticated ground-penetrating radar to probe the site. The sooner this can be done the better. Fort Worth needs to know if it is sitting on a toxic time bomb, and, if so, to get it defused.

THURSDAY am
4-27-89

Section 1, Page 36

Fort Worth Star-Telegram

Editorials/Viewpoints

Amos Carter, President-Publisher, 1984-1985 Amos Carter Jr., Publisher, 1985-1988

Michael L. O'Connor, President and Publisher

Jack B. Tinsley, Editor and Vice President	Michael Whelan, Executive Editor
Thomas Davidson, Editorial Page Editor	Guy Uttinger, Managing Editor/News
Ann Thompson, Op-Ed Page Editor	Carolyn Smith, Managing Editor/Operations

Paul A. Bowers, Associate Executive Editor

Picture Credits: Spot news photography, 1987; International Public Service, 1985

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In conjunction with the Texas Water Commission, the EPA is considering using sophisticated ground-penetrating radar to probe the site. The sooner this can be done the better. Fort Worth needs to know if it is sitting on a toxic time bomb, and, if so, to get it defused.

0152 0000 2358

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	File	FROM:	Jerry Truitt 6H-CT
		DATE	5/2/89
		TIME	9:50 am
SUBJECT			
American Cyanamid - Phone Conversation w/ Rick Hay (Ft Worth City & office)			
SUMMARY OF COMMUNICATION			
<p>Rick was calling to touch base with me concerning EPA's involvement with the site. I informed him that EPA was keeping in close contact with all parties and was monitoring the situation at this time. We agreed that it was not appropriate at this point to involve the Agency in the initial meeting being held between the City of Ft. Worth and the company. Rick stated that the company was appeared willing to put an effort forth in once and for all quieting the allegations that have been made about the Ft Worth site but he did not know what the effort would entail. He did say that the city expected American Cyanamid to prove that there is nothing there (on site) that would pose a danger beyond a reasonable doubt. The initial meeting Fri 5/5 is to discuss this. Rick also said he would call me Fri or Mon 5/8 to discuss the conclusions and and findings of the meeting.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
Continue to monitor the situation and keep in contact with the interested groups.			
INFORMATION COPIES			
TO: Coleman			

0 152 0000 2359

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input checked="" type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	File	FROM:	Jerry Truitt
		DATE	
		TIME	
SUBJECT American Cyanamid - Meeting between Roger Meachum & Reporter			
SUMMARY OF COMMUNICATION			
<p>Updated Roger on conditions between EPA, Ft. Worth, American Cyanamid, TWC. A reporter is coming in to find out what is happening with the site. I informed Roger that at this time, EPA was merely providing assistance as requested to the City and that until issues were further resolved it was unclear what role if any EPA would play (as TWC). Also told him that the only additional thing we could say to the press was that we are currently providing assistance as needed in the matter and that it would be inappropriate to make any comments since everything is preliminary at this time.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
<p>INFORMATION COPIES TO: Coleman, Brown</p>			

0 152 0000 2360

Fort Worth Star-Telegram

Tarrant/Texas

Friday A.M., May 12, 1989 A

Jerry Smith
6H

EPA cancels plan to study site of plant

BY MAX BAKER
Fort Worth Star-Telegram

The U.S. Environmental Protection Agency will not conduct an investigation into allegations that tons of hazardous waste are buried under the old American Cyanamid chemical plant in Fort Worth, an agency spokesman said yesterday.

The EPA reversed an earlier decision to reopen a previous investigation because there is not sufficient evidence to warrant another examination of the site less than a mile from downtown, said EPA spokesman Roger Meacham.

The EPA based its latest decision on soil samples it took in 1979, 1980 and 1981 as well as results of tests conducted by the Texas Water Commission when the plant was closed in 1983, Meacham said.

"Our ultimate conclusion now, as it was then, is that there simply is not a hazardous waste, health threat or environmental problem from waste that might be buried on the property," Meacham said.

It is now up to the city of Fort Worth, working with American Cyanamid, to resolve any problems that may surface with material at the plant, he said. Meacham said the EPA will give the city technical assistance on request.

American Cyanamid Co. produced a chemical catalyst at the plant that removed impurities from crude oil. During World War II, the company produced a catalyst to remove sodium and nitrogen from aviation fuel.

In the process it also produced tons of toxic waste, which employees say was buried on the 34-acre complex. At least five employees are suing the company, saying they have experienced serious health problems from prolonged exposure to the waste.

Those allegations recently caused the Texas Department of Highways and Transportation to alter its plans for a section of the proposed Southwest Freeway in order to avoid the Cyanamid site. That move has concerned city leaders and historic preservationists.

At a meeting with city officials last week, American Cyanamid agreed to give the city the same information and reports it provided to the EPA and the Texas Water Commission when Cyanamid closed the plant, said Tony Merek, manager of commercial environmental services for the company.

"Information given to the EPA and TWC was not forwarded to the city" (More on EPA on Page 28)

(more)

EPA

From Page 25

because it was not required and the city did not ask for those reports, Merex said. "But in the last few years the city has become more aware of potential environmental situations and now have a position that they want to be kept informed."

"If (the plant) was closed according to TWC and EPA rules," Merex said, American Cyanamid plans to dismantle the remaining plant equipment in the next year, demolish the buildings by 1993 and then sell the property, Merex said. He said the plant is on prime commercial real estate, especially since the state may take one-third of it to build the Southwest Freeway.

"We've been trying to sell it as is. But it is a much more attractive site for someone to purchase (without the plant) than to have a facility that has to be torn down," Merex said.

Rick Hay, an assistant to the city manager and the former city environmental health director, has been assigned to the city's inquiry into whether the site contains dangerous materials.

Hay said the city has been in constant contact with the EPA. The city and the EPA have agreed that it would be best to work with the company to locate and remove any toxic waste at the site, he said.

"We want the site addressed," Hay said. "We want the company to address the problem — and so does the EPA — if there is one."

(more)

0 152 0000 2 352



Fort Worth Star-Telegram. Ron Jenkins

Allegations of on-site toxic waste disposal have led to at least five lawsuits against American Cyanamid Co.

8 152 0000 2363

FACT SHEET
UPDATE
American Cyanamid
Ft. Worth, Texas
EPA ID# TXD008017261

Background

On May 9, 1989, a press conference was held to discuss issues pertaining to allegations raised by former employees of the company. Participants included EPA Region 6 and a local ABC affiliate (Channel 8).

It was later found that interviews were conducted on May 9, 1989, with both the company and the City of Ft. Worth. During these interviews employees of Channel 8 informed city and company officials that by taking the lead in the investigation the city had precluded EPA from taking an action at the site.

Phone conversations on May 10, 1989, between EPA, the city, and the company detailed questions asked by the interviewee and documented the fact that the actions taken by the city in no way precluded the EPA from taking any action at the site should it become necessary to do so.

New Information

As a result of the press conference, RCRA staff were directed to address some specific concerns:

1. Groundwater data- This information is being sent to EPA from the City of Ft. Worth. The company is also submitting a package of information which should include the original report. Currently, we are attempting to determine whether TWC required any additional monitoring of the site. At this time this does not appear to be the case.
2. Park area/bike trail near site- It appears that these allegations are due to results from samples taken by the City Health Dept. (Ft. Worth). This information is being sent to EPA by the city for review. Some contamination was found off-site, however the constituents and levels of contamination are not known at this time.
3. Protocol for acquiring information from DOD- Headquarters has said that correct protocol for acquiring information about DOD activities at the site would be a standard information request letter pursuant to Section 3007 of RCRA. When asked who the appropriate contact would be EPA Headquarters felt that the Assistant Secretary of the Army should be the recipient of the letter. Currently we are trying to confirm whether this would in fact be the appropriate contact.

0 132 0000 2364

RCRA ENFORCEMENT BRANCH

	ROUTING	INITIAL
SAMUEL COLEMAN	<u>✓</u>	<u> </u>
HARRIET TREGONING	<u> </u>	<u> </u>
LINDA THOMPSON	<u> </u>	<u> </u>
GUY TIDMORE	<u> </u>	<u> </u>
BETSY METCALF	<u> </u>	<u> </u>
DANNA SMITH	<u> </u>	<u> </u>
GUANITA REITER	<u> </u>	<u> </u>
BILL HONKER	<u> </u>	<u> </u>

AL DAVIS/JACK DIVITA

COMMENTS Pls discuss /

follow up

RB

FROM: RANDALL E. BROWN, CHIEF
RCRA ENFORCEMENT BRANCH

0 152 0000 2365

~~list~~
? ~~list~~
ASAP!
BW

American Cyp - follow up
Per Al

5/9/89

5/9/89

1) As ... "

Handy -

Per Al - follow up
to Channel 8 interview -
think you all have the
better

entering date
City, TW? -

ind

2) Per

info - ... war site - alleged
minated runway -

Any data / info on this
(Ft Worth sending info.)

3) Still rumors / allegations that nerve
gas buried onsite. Got to put
this to rest!

Talk to Jim
Highland

Grandex
1) Contact Chris / O'Neil Federal
Facilities / DC - what is
protocol to ask DOD - could
be confidential -

L. Kie Thiel - 3007 or 104(e)

But got to find out!

0152 0000 2366

~~list~~
? ~~list~~
ASAP!
BW

American Cyp - follow up
Per Al 5/9/89

1) Do we have any ground water monitoring data
since 1982 - from EPA, City, TW2 -

a) If not - why not

b) If so - what do we find

2) Park area/bike trail near site - alleged
contaminated runoff -

Any data/info on this
(Ft Worth sending info.)

3) Rife rumors/allegation that nerve
gas buried onsite. Got to put
this to rest!

Talk to Jim
Hightland

Grounds
1) Contact Chris/Dwight Federal
Facilities/DO - what is
protocol to ask DOB - could
be confidential -

L. Kie Thiel - 3007 or 104(re)

But got to find out!

0 152 0000 2357

CITY OF FORT WORTH, TEXAS



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 18, 1989

Mr. Jerry Truett
U.S. Environmental Protection Agency
1445 Ross Avenue, (6H-CT)
Dallas, Texas 75202-2733

Dear Mr. Truett:

Enclosed is the material we discussed regarding the American Cyanamid plant located in Fort Worth. I would welcome any comments you have regarding the test results performed by our local Health Department. I would also appreciate, if possible, a complete copy of the Weston report since the one enclosed appears to be incomplete.

Again, please feel free to contact me at (817) 870-6095 if I can be of further assistance or should you have any recommendations or concerns on how the City of Fort Worth is proceeding in this issue.

Sincerely,

Richard Hay
Assistant to the City Manager

RH/sf
sm:truett



American Cyanamid Company
Chemical Products Division
One Cyanamid Plaza
Wayne, NJ 07470

May 22, 1989



Mr. Jerry M. Truitt, E.I.T.
Environmental Engineer
Environmental Protection Agency
Allied Bank Tower
1445 Ross Avenue
Dallas, TX 75202

Dear Mr. Truitt:

Ray Merrell and I enjoyed meeting with you on May 4 and having the opportunity to review your files on our Fort Worth plant.

We did meet with Rick Hay in the Fort Worth City Manager's Office on May 5 as we advised you we would. We wanted to assure them that the plant was properly closed under your auspices, and that we, too, were concerned about the persistent rumors about our plant and the controversy surrounding the proposed route for the Southwest Expressway.

During our meeting with them, we discovered that they did not have the historical data concerning the soil and water samples that your office and the Texas Water Commission received when the plant was closed.

We are compiling this information for them and will send a copy to you for your files.

I am confident that once the City Manager has a chance to review these materials, he will concur with your original determination that the facility was properly closed and does not present a threat to the community or the environment.

I want to assure you that Cyanamid is ready to cooperate with you, the Texas Water Commission and the City Manager's office and any other federal, state or local agency, to dispel the rumors about our plant as we work to demolish the site and prepare it for sale.

Sincerely,

A. C. Marek, PE
Manager,
Commercial Environmental Services

ACM:TRM
5785V



A. C. Marek M2
American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

Mr. Jerry M. Truitt, E.I.T.
Environmental Engineer
Environmental Protection Agency
Allied Bank Tower
1445 Ross Avenue
Dallas, TX 75202



6962 0000 2510

0 152 0000 2370

FACT SHEET
UPDATE
American Cyanamid
Ft. Worth, Texas
EPA ID# TXD008017261

Background

On May 9, 1989, a press conference was held to discuss issues pertaining to allegations raised by former employees of the company. Participants included EPA Region 6 and a local ABC affiliate (Channel 8).

It was later found that interviews were conducted on May 9, 1989, with both the company and the City of Ft. Worth. During these interviews employees of Channel 8 informed city and company officials that by taking the lead in the investigation the city had precluded EPA from taking an action at the site.

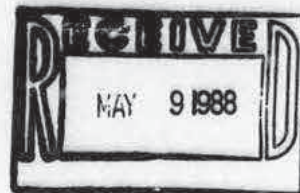
Phone conversations on May 10, 1989, between EPA, the city, and the company detailed questions asked by the interviewee and and documented the fact that the actions taken by the city in no way precluded the EPA from taking any action at the site should it become necessary to do so.

New Information

As a result of the press conference, RCRA staff were directed to address some specific concerns:

1. Groundwater data- This information is being sent to EPA from the City of Ft. Worth. The company is also submitting a package of information which should include the original report. Currently, we are attempting to determine whether TWC required any additional monitoring of the site. At this time this does not appear to be the case.
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8 152 0000 2371



American Cyanamid Sampling Report

4-27-88

Analysis by: James Scarberry

Ft. Worth Health Department

0152 10000 2372

List of metals used at American Cyanamid

*allowable
Max. Concentration
in Groundwater*

Arsenic	0.05 ppm
Cadmium	0.01
Molybdenum	
Mercury	0.002
Silver	0.05
Barium	1.0
Chromium	0.05
Lead	0.002
Cobalt	
Selenium	0.01
Copper	
Nickel	

0152 0000 2373

ENVIRONMENTAL LABORATORY REPORT

Name of Company American Cyanamid Date 4-27-88
Address 600 N Jones Phone _____
Sampling site #1 (See Map)
Fiber glass filter paper _____ Filter or Sample No. _____
Other _____ Type of sample Soil, Surface
Upwind _____ Downwind _____ Ambient _____
Temperature _____ °C Network _____ Time _____
Describe appearance of sample _____

Probable content of sample _____

Analysis requested _____

Collected by JES, JF, DK

All units are in micrograms per cubic meter, unless otherwise noted.

Particulate _____	Antimony _____
Volume _____	Bismuth _____
pH _____	Cadmium <u>2.54 ppm</u>
Sulfur dioxide _____	Calcium _____
Nitrogen oxide _____	Chromium <u>73.43 ppm</u>
Nitrogen dioxide _____	Cobalt _____
Total aliphatic aldehydes _____	Copper <u>25.27 ppm</u>
Oxidants _____	Iron _____
Ammonia _____	Lead <u>130.49 ppm</u>
Acrolein _____	Magnesium _____
Cyanide _____	Manganese _____
Microscopic analysis _____	Molybdenum _____
Pesticide _____	Nickel <u>150.99 ppm</u>
Chlorides _____	Tin _____
Fluorides _____	Zinc _____
Hydrocarbons _____	Formaldehyde _____
Asbestos _____	_____
Other _____	_____
_____	_____
_____	_____

Discussion: _____

Analyzed by JES
5-4-88

ENVIRONMENTAL LABORATORY REPORT

Name of Company American Cyanamid Date 4-27-88
 Address 600 N. Jones Phone _____
 Sampling site #2 (see map)
 Fiber glass filter paper _____ Filter or Sample No. _____
 Other _____ Type of sample Soil, Surface
 Upwind _____ Downwind _____ Ambient _____
 Temperature _____ °C Network _____ Time _____
 Describe appearance of sample _____

Probable content of sample _____

Analysis requested _____

Collected by JES, JF, DH

All units are in micrograms per cubic meter, unless otherwise noted.

Particulate _____	Antimony _____
Volume _____	Bismuth _____
pH _____	Cadmium <u>1.26 ppm</u>
Sulfur dioxide _____	Calcium _____
Nitrogen oxide _____	Chromium <u>35.69 ppm</u>
Nitrogen dioxide _____	Cobalt _____
Total aliphatic aldehydes _____	Copper <u>80.47 ppm</u>
Oxidants _____	Iron _____
Ammonia _____	Lead <u>309.09 ppm</u>
Acrolein _____	Magnesium _____
Cyanide _____	Manganese _____
Microscopic analysis _____	Molybdenum _____
Pesticide _____	Nickel <u>56.61 ppm</u>
Chlorides _____	Tin _____
Fluorides _____	Zinc _____
Hydrocarbons _____	Formaldehyde _____
Asbestos _____	
Other _____	

Discussion: _____

Analyzed by JES
5-4-88

ENVIRONMENTAL LABORATORY REPORT

Name of Company Armstrong Cyanamid Date 4-27-88
 Address 600 N. Gomo Phone _____
 Sampling site # 3 (See Map)
 Fiber glass filter paper _____ Filter or Sample No. _____
 Other _____ Type of sample Sail, surface
 Upwind _____ Downwind _____ Ambient _____
 Temperature _____ °C Network _____ Time _____
 Describe appearance of sample _____
 Probable content of sample _____
 Analysis requested _____

Collected by JCS, JF, DH

All units are in micrograms per cubic meter, unless otherwise noted.

Particulate _____	Antimony _____
Volume _____	Bismuth _____
pH _____	Cadmium <u>2.01 ppm</u>
Sulfur dioxide _____	Calcium _____
Nitrogen oxide _____	Chromium <u>40.80 ppm</u>
Nitrogen dioxide _____	Cobalt _____
Total aliphatic aldehydes _____	Copper <u>665.75 ppm</u>
Oxidants _____	Iron _____
Ammonia _____	Lead <u>165.61 ppm</u>
Acrolein _____	Magnesium _____
Cyanide _____	Manganese _____
Microscopic analysis _____	Molybdenum _____
Pesticide _____	Nickel <u>73.08 ppm</u>
Chlorides _____	Tin _____
Fluorides _____	Zinc _____
Hydrocarbons _____	Formaldehyde _____
Asbestos _____	_____
Other _____	_____
_____	_____
_____	_____

Discussion: _____

Analyzed by JCS
5-4-88

0 132 0000 2376

ENVIRONMENTAL LABORATORY REPORT

Name of Company American Cyanamid Date 4-27-88
Address 600 N. Jones Phone _____
Sampling site #14 (see map)
Fiber glass filter paper _____ Filter or Sample No. _____
Other _____ Type of sample Soil, surface
Upwind _____ Downwind _____ Ambient _____
Temperature _____ °C Network _____ Time _____
Describe appearance of sample _____

Probable content of sample _____

Analysis requested _____

Collected by JCS, JF, DH

All units are in micrograms per cubic meter, unless otherwise noted.

Particulate _____	Antimony _____
Volume _____	Bismuth _____
pH _____	Cadmium <u>1.34 ppm</u>
Sulfur dioxide _____	Calcium _____
Nitrogen oxide _____	Chromium <u>65.77 ppm</u>
Nitrogen dioxide _____	Cobalt _____
Total aliphatic aldehydes _____	Copper <u>36.54 ppm</u>
Oxidants _____	Iron _____
Ammonia _____	Lead <u>77.99 ppm</u>
Acrolein _____	Magnesium _____
Cyanide _____	Manganese _____
Microscopic analysis _____	Molybdenum _____
Pesticide _____	Nickel <u>66.60 ppm</u>
Chlorides _____	Tin _____
Fluorides _____	Zinc _____
Hydrocarbons _____	Formaldehyde _____
Asbestos _____	_____
Other _____	_____
_____	_____
_____	_____

Discussion: _____

Analyzed by JCS
5-4-88

ENVIRONMENTAL LABORATORY REPORT

Name of Company Ammonium Cyanamid Date 4-27-88
 Address 600 N Jones Phone _____
 Sampling site # 5 (see map)
 Fiber glass filter paper _____ Filter or Sample No. _____
 Other _____ Type of sample Sail, surface
 Upwind _____ Downwind _____ Ambient _____
 Temperature _____ °C Network _____ Time _____
 Describe appearance of sample _____

Probable content of sample _____

Analysis requested _____

Collected by ACS, JF, DH

All units are in micrograms per cubic meter, unless otherwise noted.

Particulate _____	Antimony _____
Volume _____	Bismuth _____
pH _____	Cadmium <u>2.45 ppm</u>
Sulfur dioxide _____	Calcium _____
Nitrogen oxide _____	Chromium <u>46.37 ppm</u>
Nitrogen dioxide _____	Cobalt _____
Total aliphatic aldehydes _____	Copper <u>394.38 ppm</u>
Oxidants _____	Iron _____
Ammonia _____	Lead <u>183.25 ppm</u>
Acrolein _____	Magnesium _____
Cyanide _____	Manganese _____
Microscopic analysis _____	Molybdenum _____
Pesticide _____	Nickel <u>484.53 ppm</u>
Chlorides _____	Tin _____
Fluorides _____	Zinc _____
Hydrocarbons _____	Formaldehyde _____
Asbestos _____	
Other _____	

Discussion: _____

Analyzed by ACS
5-4-88

ENVIRONMENTAL LABORATORY REPORT

Name of Company American Cyanamid Date 4-27-88
 Address 600 N. Jones Phone _____
 Sampling site #6 (See map) Trinity River
 Fiber glass filter paper _____ Filter or Sample No. _____
 Other _____ Type of sample Soil air pipe
 Upwind _____ Downwind _____ Ambient _____
 Temperature _____ °C Network _____ Time _____
 Describe appearance of sample _____

Probable content of sample _____

Analysis requested _____

Collected by JCS, JF, DH

All units are in micrograms per cubic meter, unless otherwise noted.

Particulate _____
 Volume _____
 pH _____
 Sulfur dioxide _____
 Nitrogen oxide _____
 Nitrogen dioxide _____
 Total aliphatic aldehydes _____
 Oxidants _____
 Ammonia _____
 Acrolein _____
 Cyanide _____
 Microscopic analysis _____
 Pesticide _____
 Chlorides _____
 Fluorides _____
 Hydrocarbons _____
 Asbestos _____
 Other _____

Antimony _____
 Bismuth _____
 Cadmium 2.55 ppm
 Calcium _____
 Chromium 28.29 ppm
 Cobalt _____
 Copper 9.69 ppm
 Iron _____
 Lead 65.11 ppm
 Magnesium _____
 Manganese _____
 Molybdenum _____
 Nickel 32.22 ppm
 Tin _____
 Zinc _____
 Formaldehyde _____

Discussion: _____

Analyzed by JCS
5-4-88

0 123 0000 2373

ENVIRONMENTAL LABORATORY REPORT

Name of Company American Cyanamid Date 4-22-88
Address 600 W. Jones Phone _____
Sampling site H-7 (see map) Trinity River bottom
Fiber glass filter paper _____ Filter or Sample No. _____
Other _____ Type of sample atmos
Upwind _____ Downwind _____ Ambient _____
Temperature _____ °C Network _____ Time _____
Describe appearance of sample _____

Probable content of sample _____

Analysis requested _____

Collected by JES J.P. DH

All units are in micrograms per cubic meter, unless otherwise noted.

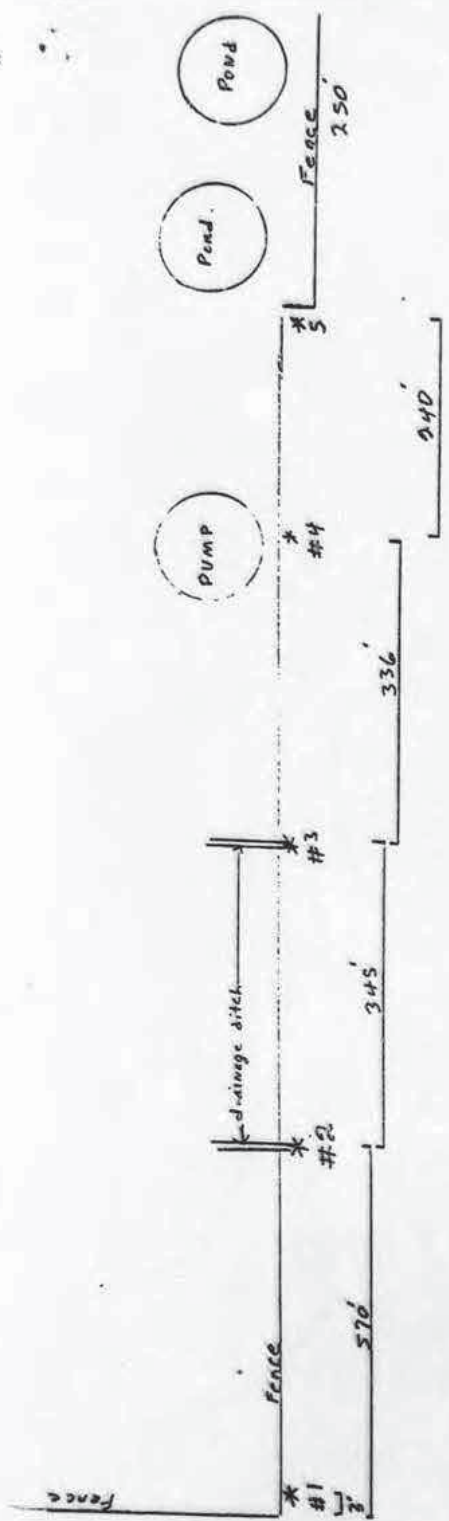
Particulate _____
Volume _____
pH _____
Sulfur dioxide _____
Nitrogen oxide _____
Nitrogen dioxide _____
Total aliphatic aldehydes _____
Oxidants _____
Ammonia _____
Acrolein _____
Cyanide _____
Microscopic analysis _____
Pesticide _____
Chlorides _____
Fluorides _____
Hydrocarbons _____
Asbestos _____
Other _____

Antimony _____
Bismuth _____
Cadmium 3.02 ppm
Calcium _____
Chromium 54.67 ppm
Cobalt _____
Copper 8.46 ppm
Iron _____
Lead 59.52 ppm
Magnesium _____
Manganese _____
Molybdenum _____
Nickel 46.08 ppm
Tin _____
Zinc _____
Formaldehyde _____

Discussion: _____

Analyzed by JES
5-4-88

0 162 0000 2330



dike

broken
#6 pipe

#7 Trinity River



#6 inside pipe

#7 dredge used

0 152 0000 238 1

POOR QUALITY DOCUMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

TX 0008017261

JAN 14 1986

TX 1023

Thank you for your inquiry of December 23, 1985, on behalf of one of your constituents, regarding allegations that toxic materials were buried at the American Cyanamid Chemical Company in Fort Worth, Texas. This facility was inspected by the Environmental Protection Agency (EPA) on July 30, 1980. Mr. Arthur A.E. Berkely was interviewed by EPA representatives in January 1981, after which a formal request for information to American Cyanamid was prepared. Their response to this letter indicated no knowledge of any hazardous materials onsite. In August 1981, the company withdrew its Superfund notification, which had been submitted erroneously based upon inaccurate information on the nature of one of the plant's waste materials. This material did not meet the definition of a hazardous waste under the Resource Conservation and Recovery Act (RCRA), as originally assumed.

The facility closed approximately three years ago and voluntarily removed all wastes during closure. The Texas Water Commission (TWC) witnessed the closure and has data on monitor wells which indicate no contamination has occurred in the groundwater.

Based upon the available information, it is the belief of the EPA and the TWC that there has been no hazardous waste activity at this site. If you should require any further information regarding this facility, please contact the TWC or me.

Sincerely yours,

Myron O. Knudson Jr.

Dick Whittington, P.E.
Regional Administrator

cc: Larry Soward, Executive Director
Texas Water Commission

0152 0000 2302

SECTION 1

INTRODUCTION

1.1 LOCATION OF SITE

The American Cyanamid facility is located within the Fort Worth City limits, in the northern part of the city, adjacent to the Trinity River. Geologically, the area rests on crinaceous sediments including clays, sands and gravels, and marls.

The eastern side of the plant borders on a flood management area managed by Tarrant County Water Control and Improvement District #1. A levee runs near the plant property parallel to the river which is approximately 700 feet from the plant border. The site is topographically flat at an elevation of approximately 532 feet above sea level. The land slopes toward the river east of the levee.

1.2 BACKGROUND

Two disposal pits have been operated along the eastern side of the plant from the time American Cyanamid purchased the facility in 1946 until approximately 1971. Various off-grade catalysts and process filtrates have been disposed of in these pits. Off-grade Phthalic Anhydride Catalyst is the only defined hazardous waste reported to be buried in these pits. This catalyst is composed of silica substrate impregnated with vanadium pentoxide. Interviews with long-term employees which were conducted by plant personnel indicated that 25 to 50 partially filled drums, possibly containing off-grade Phthalic Anhydride Catalyst were buried in an area to the northeast of the xerogel building. Past aerial photographs indicate both containerized and loose materials in these pits. When the disposal facilities were closed in the early 1970's, the pits were covered with about three feet of sand and topsoil. The bottom of the pit is estimated to be 12 to 15 feet below grade.

1.3 PROBLEM DEFINITION

Of the materials known to be contained in the disposal pits, vanadium is the only one listed as a hazardous substance by the Resource Conservation and Recovery Act (RCRA). Under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (Superfund), American Cyanamid has since notified EPA of the existence of the disposal pits since they are known to contain a hazardous substance. The Superfund notification also required an indication of "known, suspected or likely releases to the environment".

Although no monitoring data is required at the time of notification, it was the desire of the American Cyanamid Company to conduct a hydrogeologic investigation to determine the existing ground water quality and flow directions in areas surrounding the abandoned pits.

1.4 PURPOSE AND SCOPE

As a result, American Cyanamid has engaged Roy F. Weston, Inc. to conduct an investigation of hydrogeologic conditions at the site. The purpose of the investigation was to determine ground-water depth and flow direction at the site and to determine ground-water quality upgradient and downgradient from the covered landfill area. This will enable initial conclusions to be reached concerning the possible impact of the landfill on ground-water quality.

SECTION 2

FIELD INVESTIGATION

2.1 LOCATION OF MONITORING WELLS

Four monitoring wells were placed in the area of investigation to measure ground-water flow and to sample water quality. The location of the wells is shown on the site plan (Figure 1). Well 1 is located in the western side of the plant, hydrologically upgradient from the covered landfill. Well 2 is located just adjacent, to the east, of the landfill site. Wells 3 and 4 are located roughly midway between the landfill and the river.

Wells 2, 3 and 4 are all hydrologically downgradient from the landfill. Well 1 is a background well and will provide a reference for water quality before it reaches the landfill area.

Because the landfill is near the eastern boundary of the plant grounds, it was impossible to locate downgradient wells on plant property. Wells 2, 3 and 4 were located, therefore, on adjacent property belonging to the Tarrant Company Water District #1. The monitor well installation was done with the full permission of the District. At their request, pole markers were placed around each well to prevent grass cutting machinery and other vehicles from running over the protective well casings that protrude above the ground.

2.2 CONSTRUCTION OF MONITORING WELLS

The wells were drilled using a mud-rotary method and ranged in depth from 40 to 50 feet. Four-inch diameter PVC pipe with 10 feet of slotted screen was used to case the wells. The space around the screens was gravel packed to a level five to 10 feet above the screens. The top of the pack was sealed with two feet of bentonite. The casing sections were connected with machine screens; no chemical adhesive was used. Protective six-inch steel casings were placed at the ground surface and cemented into place.

0 152 0000 2385

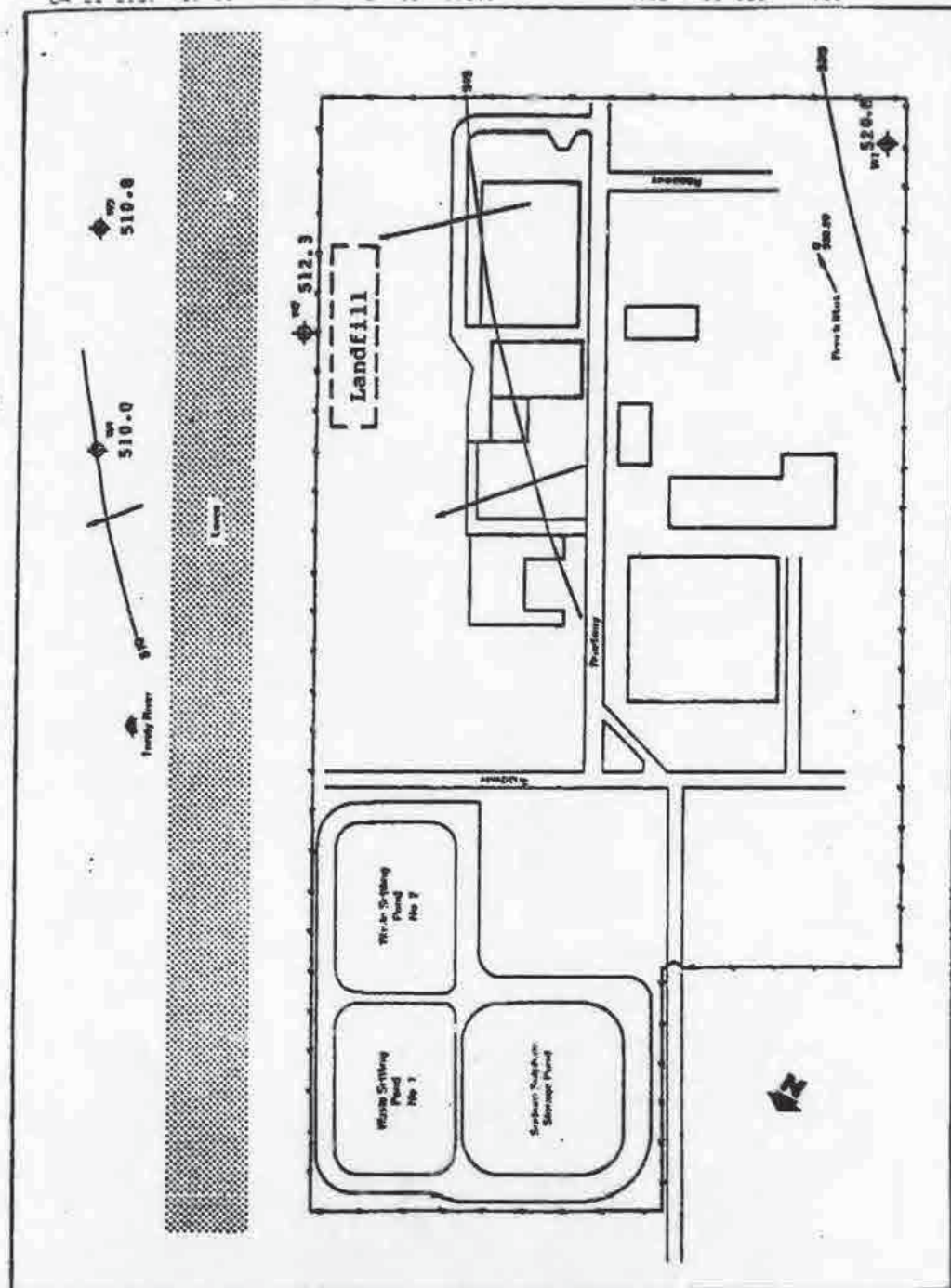


FIGURE 1 GROUND WATER CONTOURS AND LOCATION OF MONITORING WELLS



The wet cement also served to seal the wells at the ground surface. Ground and casing elevations were determined for each well in order to reference well water depths. These elevations were tied into a permanent bench mark located on the southwestern area of the plant grounds.

2.3 DESCRIPTION OF SUBSURFACE CONDITIONS

Material encountered at each well consisted of brown clays, sand and gravels and marls. Well logs are presented in the appendix. In general, a brown, cohesive, sandy clay was encountered below the surface, underlain by sandy clay and marls from 25 to 50-foot depths.

2.4 WELL PUMPING OPERATIONS

Each well was pumped with a submersible pump for approximately one hour before sampling. None of the wells were able to retain a constant pump rate of eight to 10 gallons per minute (gpm) that was produced by the pump. When the pumping rate was reduced, Wells 1 and 2 could sustain a flow of approximately three to four gpm and Wells 3 and 4, a flow of approximately one gpm. To clear fine sediments from the wells, the pump was surged, that is, wells were pumped completely down and then allowed to recover before pumping again. Twenty-four hours after the completion of the pumping, clear water samples were taken with a bailer from each well. Sample water was appropriately preserved and shipped immediately by air express to Weston's West Chester, Pennsylvania laboratory.

WISSEN

SECTION 3

ANALYSIS OF RESULTS

3.1 GROUND-WATER FLOW

Figure 1 presents a map of the ground-water surface up-gradient and downgradient from the landfill. Well water levels ranged from 9.4 to 23.7 feet below ground surface. Ground-water surface elevations are based on well water level measurements made on 12 October 1981. The direction of ground-water flow under the plant site is to the northeast, toward the river.

Because of the relatively low permeability, the overlying clay acts as a partially confining boundary to the more permeable underlying sediments.

Table I presents well water elevations measured between 8 and 16 October. During that period, more than 12 inches of rain fell in the Fort Worth area. The rise in well levels reflects the increased hydraulic load from infiltration through the ground surface and the rise in river level.

3.2 LEVELS OF GROUND-WATER QUALITY TESTS

Each well water sample was tested for pH, specific conductance, total organic carbon (TOC), vanadium and copper. The results of these tests are presented in Table II. The pH results for all samples were neutral (6.9 to 7.0). Vanadium was not present in detectable amounts in any sample. Copper was slightly detectable in Wells 3 and 4 (.06 and .07 ppm respectively).

Specific conductance is significantly higher in Well 2 compared to the background level in Well 1.

In summary, no significant differences were observed between background and downgradient levels of copper and vanadium. However, the relatively higher levels of specific conductance in Well 2 may indicate the presence of constituents not identified in the down-gradient wells.

04/11/1989 13:38 TEXAS WATER



Table I

WELL WATER ELEVATIONS
AMERICAN CYANAMID, FORT WORTH, TEXAS
OCTOBER 1981

Well Number	Elevation of Ground Surface	Water Elevation			
		10/8	10/12	10/14	10/16
1	532.9	519.6	520.8	523.5	523.5
2	533.8	511.4	512.3	513.2	515.3
3	532.3	510.2	510.8	512.1	514.7
4	532.8	509.1	510.0	512.9	514.1

0152 0000 2309

44/11/1983 10:00

TESTED WATER QUALITY



115 100 001 100

TABLE II

RESULTS OF WATER QUALITY TESTS
AMERICAN CYANAMID, FORT WORTH, TEXAS

<u>Well Number</u>	<u>Date Sampled</u>	<u>pH</u>	<u>Specific Conductance</u>	<u>Cu</u> *	<u>V</u> *	<u>TOC</u> *
1	9/30/81	7.0	1100	<.03	<.05	3.6
2	9/30/81	6.9	3500	<.03	<.05	2.5
3	10/01/81	7.0	1200	.07	<.05	2.5
4	10/01/81	6.9	1900	.06	<.05	2.6

* Unit of measurement = ppm.



SECTION 4

CONCLUSIONS AND RECOMMENDATIONS

4.1 CONCLUSIONS

- Ground water beneath the site flows north-east, toward the Trinity River.
- Water levels were 18 to 23 feet below the ground surface by the landfill during the investigation period. The higher level was recorded after a period of very heavy rain. Water in Well 1, on the west side of the plant ranged from 10 to 13 feet below the surface.
- No significant difference in copper or vanadium levels was observed between background Well 1 and Wells 2, 3 and 4 downgradient from the landfill.
- No detectable amounts of vanadium were present in any well samples.
- The specific conductance level recorded in Wells 2 was significantly higher than the background wells.

4.2 RECOMMENDATIONS

Based on the above conclusions, Weston recommends the following follow-up activity:

- Well water level measurements should be made at least quarterly for one year. An informal record of major storms and dry periods before measurements should also be compiled.
- At least one additional round of well water sampling should be done to confirm parameters already tested.

0152 0000 2391

04/11/1989 10:00 YEARS WATER COMMISSION 112 400 000 011

WOMAN

- The ground-water quality data from the second round of sampling should be evaluated to determine the need for any additional testing.

0 152 2000 2392

RECEIVED
EPA REGION VI
CITY OF FORT WORTH, TEXAS

89 MAY 24 PM 3:54
HAZARDOUS WASTE MGMT. DIV.



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 12, 1989

Mr. Robert E. Layton, Jr.
Regional Administrator
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, Texas 75202

Dear Mr. Layton

Due to a clerical error, the following corrections to the attached letter need to be made.

Paragraph 2, First Sentence should read:

In an effort to resolve the issues, city representatives
and your agency met on an almost daily basis over the last
several weeks.

We apologize for any inconvenience this may have caused.

Sincerely,

David Ivory

David Ivory
Senior Assistant City Manager

DAI/sf

CITY OF FORT WORTH, TEXAS



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 11, 1989

Mr. Robert E. Layton, Jr.
Regional Administrator
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, Texas 75202

Dear Mr. Layton:

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In an effort to resolve the issues, representatives and your agency on an almost daily basis over the last several weeks. If your agency feels the need to have a technical assistance team evaluate this site, please carry out this process. The City of Fort Worth wishes to encourage EPA to carry out whatever analysis you deem appropriate. In addition, I respectfully request your agency to provide a written explanation as to the position EPA has had in the past and currently has regarding the facility.

I want to assure you that our intention is to resolve the concerns on the American Cyanamid site and work both with your agency and the company in resolving this as soon as possible.

Your assistance in addressing this issue as well as any additional concerns you may have is openly accepted.

Sincerely,

Douglas Harman
City Manager

cc: H. Larry McMillen, Chief, Fort Worth Fire Department
Nick U. Curry, Director, Public Health Department
Gary Santerre, Director, Transportation and Public Works
Richard Sawey, Director, Water Department
David Ivory, Senior Assistant City Manager
Ruth Ann McKinney, Assistant City Manager
Bob Terrell, Assistant City Manager
Ramon Guajardo, Assistant City Manager
Alan Davis, U. S. Environmental Protection Agency, Region VI

6X

**PASSPORT
FIRST CLASS**

[illegible]

TEXAS SECTION 64-CT
SAMUEL COLEMAN SECTION C

Questions

1. Need for TAT
2. EPA's position
Past
Current

- what we look for
1. EPA criteria to investigate

No immediate threat

a. Physical

Subsurface

Solid

Ground water

Above ground

Trinity river

Evidence of surface impairments

b. Documents

Manifests

Process

Storage

Uses

2. Why TAT

3. Past Position

Scope of investigation

Findings

4. Current position

0 132 0000 2376

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	Serry Truitt 6H-CT	FROM:	Rick Hay Ft. Worth City Managers Office
		DATE	5-30-89
		TIME	4:17
SUBJECT American Cyanamid Meeting - Rick Hay			
SUMMARY OF COMMUNICATION			
<p>Another meeting of the City and American Cyanamid is to take place Fri 6-2 at 8:30 am. Participants will include the City Fire Dept and Health Dept. TWC will be invited but may not attend as the company is meeting with them on Wed. 5-31-89.</p> <p>Rick asked if EPA would attend. I told him I would check and get back with him. He also asked if the Agency (EPA) had changed the its position since we had last talked. I told him no.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
Do we want to attend and if so who goes?			
INFORMATION COPIES			
TO: Brown 6H-C Coleman 6H-CT			

5-30-89 Ray Merrill 9:45 4:16
Not in

4:17 Rick Hay City of Fort Worth (City Mng. Office)
Has been Talking to Ray Merrill - Is there any reason
for EPA to be at meeting
Meeting with TWC in Austin Texas
- (Friday - City Manager's office 8:30 am) -

with F.D., City Health Dept. will attend
TWC will be invited but may not come
since are meeting on Wed.

0 132 00000 2372

CITY OF FORT WORTH, TEXAS

MAY 11 1989

HAZARDOUS



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 11, 1989

Mr. Robert E. Layton, Jr.
Regional Administrator
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, Texas 75202

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Sincerely,

Douglas Harman

Douglas Harman
City Manager

cc: H. Larry McMillen, Chief, Fort Worth Fire Department
Nick U. Curry, Director, Public Health Department
Gary Santerre, Director, Transportation and Public Works
Richard Sawey, Director, Water Department
David Ivory, Senior Assistant City Manager
Ruth Ann McKinney, Assistant City Manager
Bob Terrell, Assistant City Manager
Ramon Guajardo, Assistant City Manager
Alan Davis, U. S. Environmental Protection Agency, Region VI

0 152 0000 2347

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
TO: <i>Protest Hitcher</i> <i>Superfund Site</i> <i>Assessment Section</i>		FROM: <i>Bob Behm, U.S. Army</i> <i>Corps of Engineers, Ft.</i> <i>Worth Dist. 817-334-3222</i>	
SUBJECT: <i>American Cyanamid Facility, Fort Worth, Texas</i>		DATE: <i>May 16, 1989</i> TIME:	
SUMMARY OF COMMUNICATION - Mr Behm called to follow up on an inquiry he received from Jim Highland of the FEA, Region 6, Federal Facility Coordinator. Mr Highland had asked if the American Cyanamid Company facility in Fort Worth had ever been owned by the Department of Defense (DOD). - Mr. Behm said that properties that were owned by DOD were eligible for an environmental assessment under the Defense Environmental Restoration Account (DERA) program. - The Corps of Engineers, Real Estate group has completed a thorough review relative to the American			
CONCLUSIONS, ACTION TAKEN OR REQUIRED Provide information to RCRA Enforcement Branch, Emergency Response Branch and Federal Facilities Coordinator			
INFORMATION COPIES TO: <i>Coleman Hunt (6H-CT), Mallens (6E-EI),</i> <i>Highland (6E-FF), Taylor (6N-MA) File #TX0008017261</i>			

(2)

Cyanamid facility in question and found no evidence of DOD ownership, including any DOD ownership/contractor operated situation. Therefore, the Corps would not be conducting a DERA evaluation.

- Mr. Behm has discussed the Corps' findings with Mr. Ray Merrell of American Cyanamid. Mr. Merrell had been under the impression that the DOD had owned the plant for a period of time in the early 1940s. Mr. Behm told Mr. Merrell to contact him if American Cyanamid can locate any documents which confirm DOD ownership.

CITY OF FORT WORTH, TEXAS



June 9, 1989

OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-671 / 4

Mr. Anton C. Marek, P.E.
Manager, Commercial Environmental Services
American Cyanamid Company
Chemical Products Division
One Cyanamid Plaza
Wayne, NY 07470



Dear Mr. Marek:

The City of Fort Worth has no conflict with American Cyanamid utilizing Roy F. Weston, Inc. as their consultant. I understand the firm will be preparing a program which incorporates the issues/concerns as outlined in my letter of June 6, 1989. You have stated that Weston will provide a preliminary report for staff's review prior to the end of June. I understand the City will retain the right to request reasonable changes in this report after a thorough review and discussion with your company and Weston has been completed.

I appreciate your prompt attention to this issue and look forward to meeting with you and Weston in the near future.

If you have any questions or need additional information, please contact Rick Hay.

Sincerely,

Douglas Harman
City Manager

DH:kc

cc: ☒ George J. Sella, Jr., Chief Executive Officer, American Cyanamid
☒ Jerry Truett, U. S. EPA Region VI, Dallas, Texas
David Gill, Manager, Texas Water Commission, District 4
The Honorable Mayor and Members of the Fort Worth City Council
David A. Ivory, Senior Assistant City Manager
Richard Hay, Assistant to the City Manager
Wade Adkins, City Attorney
Gary Santerre, Director, Transportation/Public Works Department
Dr. Nick Curry, Director, Public Health
Larry McMillen, Fire Chief
Jim Tidwell, District Chief, Fire Department
Frances Droste, Environmental Coordinator

CITY OF FORT WORTH, TEXAS
OFFICE OF THE CITY MANAGER
1000 THROCKMORTON ST. / FORT WORTH, TEXAS 76102
200634

Jerry Truett
U.S. Environmental Protection Agency
1445 Ross Avenue (64-CT)
Dallas, Texas 75202-2733

PRESORTED
FIRST CLASS



0152 0000 2403

CITY OF FORT WORTH, TEXAS

HAZARDOUS



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 11, 1989

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Regional Administrator
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, Texas 75202

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Sincerely,

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Douglas Harman
City Manager

cc: H. Larry McMillen, Chief, Fort Worth Fire Department
Nick U. Curry, Director, Public Health Department
Gary Santerre, Director, Transportation and Public Works
Richard Sawey, Director, Water Department
David Ivory, Senior Assistant City Manager
Ruth Ann McKinney, Assistant City Manager
Bob Terrell, Assistant City Manager
Ramon Guajardo, Assistant City Manager
Alan Davis, U. S. Environmental Protection Agency, Region VI

0 152 0000 2404

CITY OF FORT WORTH, TEXAS



89 MAY 18 AM 11:08
OFFICE OF THE CITY MANAGER
HAZARDOUS WASTE MANAGEMENT STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 12, 1989

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Regional Administrator
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, Texas 75202

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Sincerely,

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David Ivory
Senior Assistant City Manager

DAI/sf

CITY OF FORT WORTH, TEXAS



OFFICE OF THE CITY MANAGER
1000 THROCKMORTON STREET
FORT WORTH, TEXAS 76102
870-6111 / AREA CODE 817

May 11, 1989

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Bob Terrell, Assistant City Manager
Ramon Guajardo, Assistant City Manager
Alan Davis, U. S. Environmental Protection Agency, Region VI

CITY OF FORT WORTH, TEXAS

OFFICE OF THE CITY MANAGER
1000 THROCKMORTON
ST., FORT WORTH, TEXAS 76102
200634

Mr. Alan Davis
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue (6T-AN)
Dallas, TX 75202

PRESTORIED
FIRST CLASS



0187 0000 2405
9072 0000 2410

0 132 0000 2407

HAZARDOUS WASTE MANAGEMENT DIVISION, 6H

FROM: Director, 6H

ROUTING

INITIAL

() J. Divita, Deputy Director	_____
() T. Hullum, Division Secretary	_____
() A. Gersh, Writer-Editor	_____
() K. Bond, Acting Human Resources Spcl.	_____
() H. Sherrow, Program Analyst	_____
() G. Jackson, Clerk Typist	_____
() D. Denmon, Clerk Typist	_____
() B. Honker, H. W. Permits	_____
() R. Brown, H. W. Enforcement	_____
() G. Reiter, H. W. Program	_____
() S. Becker, S. F. Enforcement	_____
() C. Edlund, S. F. Program	_____
(/) B. Williamson, S. F. Management	_____
() W. Rhea, U.S.T.	_____
() C. Hickam, A.T.S.D.R.	_____

NOTES: _____



American Cyanamid Company
Chemical Products Division
One Cyanamid Plaza
Wayne, NJ 07470



May 25, 1989

Mr. Rick Hay
Assistant to City Manager
City of Fort Worth
1000 Throckmorton
Fort Worth, TX 76102

Subject: American Cyanamid Inactive Plant Site
600 North Jones Street, Fort Worth

Dear Mr. Hay:

Enclosed are three copies of the background information concerning the closure of our Fort Worth plant that we discussed in our meeting. Following the executive summary, the information is organized into four categories for easy reference: site closure, EPA waste site investigations, water and soil analysis and groundwater monitoring.

Once you have had an opportunity to review these materials, I am confident that you will concur with the EPA's original decision that our Fort Worth plant was closed properly in accordance with all federal and state requirements and does not pose an environmental, health or safety hazard to the community.

I would also like to tell you about our current plans for the site and give you the cost estimate to prepare the north end of the property for potential use by the Texas Highway Department for the Southwest Highway alignment option through the property.

Our current activity is focused on preparing the property for sale. Over the next two to three years we plan to salvage equipment, remove all asbestos from piping, process equipment and buildings, remove the salt cake, which is non-hazardous, from a storage impoundment, remediate soils containing elevated pH from beneath a former raw material storage area and demolish the buildings. Equipment salvage will continue over the next year. Asbestos removal, salt cake and high pH soil remediation will begin within the next twelve months. Our objective is to have the site ready for sale within three years.